

G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
 ATLANTA DIVISION
3 CASE NO. 1:20-cv-05232-JPB
 1:20-cv-05231-JPB
4 1:20-cv-05233-SEG
5 G.W., J.G. and A.G.,
6 Plaintiffs,
7 vs.
8 NORTHBROOK INDUSTRIES, INC. d/b/a UNITED INN AND
 SUITES,
9 Defendant.
10 _____/

11 ZOOM VIDEO-RECORDED DEPOSITION OF
12 KARIM VELLANI
13
14 Tuesday, November 28th, 2023
 9:32 a.m. - 4:07 p.m.
15
16 Stenographically Reported By:
 Edward F. Kidd
17 Registered Professional Reporter
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G.W., ET AL. vs NORTHBROOK INDUSTRIES, INC.
Karim Vellani on 11/28/2023

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<p>1 APPEARANCES:</p> <p>2 (All appearances remotely via Zoom)</p> <p>3</p> <p>4 On behalf of Plaintiffs:</p> <p>5 FINCH MCCRANIE, LLP</p> <p>6 229 Peachtree Street Northeast</p> <p>7 Suite 2500</p> <p>8 Atlanta, Georgia 30303</p> <p>9 (404)658-9070</p> <p>10 BY: DAVID H. BOUCHARD, ESQ.</p> <p>11 david@finchmccranie.com</p> <p>12</p> <p>13 On behalf of Defendant Northbrook Industries d/b/a</p> <p>14 United Inn & Suites in the A.G. and G.W. Matters:</p> <p>15</p> <p>16 LEWIS, BRISBOIS, BISGAARD & SMITH, LLP</p> <p>17 600 Peachtree Street Northeast</p> <p>18 Suite 4700</p> <p>19 Atlanta, Georgia 30308</p> <p>20 (404)348-8585</p> <p>21 BY: ADI ALLUSHI, ESQ.</p> <p>22 CAMERON MOBLEY, ESQ.</p> <p>23 adi.allushi@lewisbrisbois.com</p> <p>24 cameron.mobley@lewisbrisbois.com</p> <p>25</p> <p>16 On behalf of Defendant Northbrook Industries d/b/a</p> <p>17 United Inn & Suites in J.G. Matter:</p> <p>18</p> <p>19 SMITH, GAMBRELL & RUSSELL, LLP</p> <p>20 1105 West Peachtree Street Northeast</p> <p>21 Suite 1000</p> <p>22 Atlanta, Georgia 30309</p> <p>23 (404)815-3500</p> <p>24 BY: DANA M. RICHENS, ESQ.</p> <p>25 drichens@sgrlaw.com</p> <p>ALSO PRESENT: ROCCO FRANCO, Videographer</p>	<p>1 The following proceedings began at 9:32 a.m.:</p> <p>2 THE VIDEOGRAPHER: This is the beginning</p> <p>3 of the deposition of Karim Vellani in the</p> <p>4 matter of G.W. versus Northbrook Industries,</p> <p>5 Inc., et al. Today's date is November 28th,</p> <p>6 2023, and the time on the monitor is 9:32 a.m.</p> <p>7 My name is Rocco Franco and I'm the</p> <p>8 videographer. The court reporter is Ed Kidd.</p> <p>9 And we are here with Huseby Global Litigation.</p> <p>10 Counsel, please introduce yourselves after</p> <p>11 which the court reporter will swear in the</p> <p>12 witness.</p> <p>13 MR. BOUCHARD: Good morning. David</p> <p>14 Bouchard for the law firm Finch McCranie on</p> <p>15 behalf of plaintiffs A.G., G.W. and J.G.</p> <p>16 MR. ALLUSHI: Good morning. Adi Allushi</p> <p>17 and Cameron Mobley is here as well from Lewis,</p> <p>18 Brisbois, Bisgaard & Smith on behalf of United</p> <p>19 Inn for the A.G. and G.W. cases.</p> <p>20 MS. RICHENS: And I'm Dana Richens with</p> <p>21 Smith, Gambrell & Russell on behalf of</p> <p>22 Defendant Northbrook Industries, Inc. d/b/a</p> <p>23 United Inn & Suites in the J.G. matter.</p> <p>24 THE STENOGRAPHER: All right.</p> <p>25 Mr. Vellani, would you kindly raise your right</p>																																														
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<p>1 I N D E X</p> <p>2</p> <table> <tr> <td>3 Examination</td><td align="right">Page</td></tr> <tr> <td>4 Direct By Mr. Bouchard</td><td align="right">5</td></tr> <tr> <td>5 Cross By Ms. Richens</td><td align="right">232</td></tr> <tr> <td>6 Redirect By Mr. Bouchard</td><td align="right">233</td></tr> <tr> <td>7 Certificate of Oath</td><td align="right">236</td></tr> <tr> <td>8 Certificate of Reporter</td><td align="right">237</td></tr> <tr> <td>9 Errata Sheet (forwarded upon execution)</td><td align="right">238</td></tr> <tr> <td>10 PLAINTIFF EXHIBITS</td><td></td></tr> <tr> <td>11</td><td></td></tr> <tr> <td>12 No.</td><td align="right">Page</td></tr> <tr> <td>13 1 TAG Threat Analysis Report J.G. vs. Northbrook</td><td align="right">37</td></tr> <tr> <td>14 2 TAG Threat Analysis Report A.G. vs. Northbrook</td><td align="right">38</td></tr> <tr> <td>15 3 TAG Threat Analysis Report G.W. vs. Northbrook</td><td align="right">38</td></tr> <tr> <td>16 4 10/29/18 Email from Tim Wade to United Inn, Subject: Missing Person - Attachments: Bolo Jhordyn Grimes.docx</td><td align="right">96</td></tr> <tr> <td>17 5 Comprehensive Human trafficking Assessment</td><td align="right">126</td></tr> <tr> <td>18 6 Vellani Invoices Pertaining to A.G.</td><td align="right">235</td></tr> <tr> <td>19 7 Vellani Invoices Pertaining to G.W.</td><td align="right">235</td></tr> <tr> <td>20 8 Vellani Invoices Pertaining to J.G.</td><td align="right">235</td></tr> <tr> <td>21</td><td></td></tr> <tr> <td>22</td><td></td></tr> <tr> <td>23 (Stenographer's Note: All documents were sent electronically. A digital sticker was placed on the documents which were marked during the proceeding.)</td><td></td></tr> <tr> <td>24</td><td></td></tr> <tr> <td>25</td><td></td></tr> </table>	3 Examination	Page	4 Direct By Mr. Bouchard	5	5 Cross By Ms. Richens	232	6 Redirect By Mr. Bouchard	233	7 Certificate of Oath	236	8 Certificate of Reporter	237	9 Errata Sheet (forwarded upon execution)	238	10 PLAINTIFF EXHIBITS		11		12 No.	Page	13 1 TAG Threat Analysis Report J.G. vs. Northbrook	37	14 2 TAG Threat Analysis Report A.G. vs. Northbrook	38	15 3 TAG Threat Analysis Report G.W. vs. Northbrook	38	16 4 10/29/18 Email from Tim Wade to United Inn, Subject: Missing Person - Attachments: Bolo Jhordyn Grimes.docx	96	17 5 Comprehensive Human trafficking Assessment	126	18 6 Vellani Invoices Pertaining to A.G.	235	19 7 Vellani Invoices Pertaining to G.W.	235	20 8 Vellani Invoices Pertaining to J.G.	235	21		22		23 (Stenographer's Note: All documents were sent electronically. A digital sticker was placed on the documents which were marked during the proceeding.)		24		25		<p>1 hand.</p> <p>2 Do you solemnly swear that the testimony</p> <p>3 you are about to give will be the truth, the</p> <p>4 whole truth, and nothing but the truth?</p> <p>5 THE WITNESS: Yes, sir, I do.</p> <p>6 Thereupon:</p> <p>7 KARIM VELLANI</p> <p>8 having been first duly sworn, was examined and</p> <p>9 testified as follows:</p> <p>10 DIRECT EXAMINATION</p> <p>11 BY MR. BOUCHARD:</p> <p>12 Q. Good morning, Mr. Vellani. My name is</p> <p>13 David Bouchard. We met briefly off the record.</p> <p>14 It's nice to see you this morning, sir.</p> <p>15 A. You too, sir. Nice to meet you.</p> <p>16 Q. And, sir, you understand that I represent</p> <p>17 the plaintiffs A.G., G.W. and J.G. in three separate</p> <p>18 cases filed against United Inn and Suites. You</p> <p>19 understand that?</p> <p>20 A. Yes, I do.</p> <p>21 Q. And you and I have not spoken prior to</p> <p>22 today, is that correct, sir?</p> <p>23 A. That is correct.</p> <p>24 Q. You have never spoken to anybody from my</p> <p>25 law firm. Is that also correct?</p>
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<p>1 A. I don't know. I don't think so.</p> <p>2 MR. BOUCHARD: All right. For the record,</p> <p>3 just a few preliminary items. This deposition</p> <p>4 is taken on behalf of plaintiff [A.G.] in case</p> <p>5 number 120-cv-05231. It has been cross-noticed</p> <p>6 in case number 120-cv-05232 which is [J.W.]'s</p> <p>7 lawsuit and in case number 120-cv-05233 which</p> <p>8 is [J.G.]'s lawsuit.</p> <p>9 And I will say for the record for the</p> <p>10 purposes of the court reporter, there is a</p> <p>11 confidentiality order in effect in all three</p> <p>12 cases. So while I will be referring to the</p> <p>13 plaintiffs at times by their full names, I</p> <p>14 would ask that all references to the plaintiffs</p> <p>15 be modified in the record to their first</p> <p>16 initials which is how the cases are captioned.</p> <p>17 Counsel for the defendants in all three cases</p> <p>18 are present after receiving reasonable notice</p> <p>19 of the deposition.</p> <p>20 Counsel, is it agreeable that all</p> <p>21 objections other than to the form of the</p> <p>22 question or to an issue of privilege are</p> <p>23 preserved?</p> <p>24 MS. RICHENS: Yes, and I would also like</p> <p>25 to confirm our agreement before we got on the</p>	<p>1 referring to the United Inn and Suites at 4649</p> <p>2 Memorial Drive in Decatur, Georgia, in slightly</p> <p>3 different ways. But, sir, I would like you to agree</p> <p>4 with me that our understanding today will be that</p> <p>5 when we're talking with the hotel or the United Inn</p> <p>6 or 4649 Memorial, we're talking about the same</p> <p>7 place, the United Inn and Suites. Is that</p> <p>8 agreeable, sir?</p> <p>9 A. Yes, sir.</p> <p>10 Q. I understand, Mr. Vellani, that you have</p> <p>11 been deposed before. Is that correct?</p> <p>12 A. Yes, sir.</p> <p>13 Q. I'm going to bypass the typical ground</p> <p>14 rules of the deposition because I'm comfortable and</p> <p>15 trusting that you understand them, sir, based on</p> <p>16 your experience in prior depositions. Just two</p> <p>17 points I did want to cover with you. One, if</p> <p>18 anybody needs to take a break but most importantly,</p> <p>19 you, Mr. Vellani, at any point in time, please let</p> <p>20 me know. I would just ask that you wait to ask for</p> <p>21 a break until after any pending questions have been</p> <p>22 answered in full. Is that fair?</p> <p>23 A. Yes, sir.</p> <p>24 MR. BOUCHARD: And I will note for the</p> <p>25 record, Dana, and Adi and Mr. Videographer, and</p>
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<p>1 record to stipulate that any objection by</p> <p>2 counsel in one case would be deemed an</p> <p>3 objection similarly stated by counsel in the</p> <p>4 other case or cases so that we're not bogging</p> <p>5 down the stenographer.</p> <p>6 MR. BOUCHARD: That's confirmed, Dana.</p> <p>7 MR. ALLUSHI: Agreed on behalf of Lewis</p> <p>8 Brisbois, too.</p> <p>9 MR. BOUCHARD: This deposition is taken</p> <p>10 pursuant to properly served deposition notices</p> <p>11 and cross-notices and is taken for all purposes</p> <p>12 permitted under the Federal Rules of Civil</p> <p>13 Procedure and the Georgia Civil Practice Act</p> <p>14 including but not limited to preservation of</p> <p>15 testimony and cross-examination.</p> <p>16 Is that agreed, Counsel?</p> <p>17 MS. RICHENS: Why are you referencing the</p> <p>18 Georgia Civil Practice Act?</p> <p>19 MR. BOUCHARD: Because we have a</p> <p>20 negligence claim under Georgia law.</p> <p>21 MS. RICHENS: Okay. Fine.</p> <p>22 BY MR. BOUCHARD:</p> <p>23 Q. Mr. Vellani, today I'm going to be</p> <p>24 referring to "the United Inn and Suites," "the</p> <p>25 United Inn," "the hotel" at various points. I'll be</p>	<p>1 the court reporter, I have a brief call that I</p> <p>2 need to make at 11:00 a.m. So I am planning to</p> <p>3 take a break from probably 10:55 to</p> <p>4 approximately 11:05 or 11:10. Just for</p> <p>5 planning purposes, I'm letting everybody know</p> <p>6 that.</p> <p>7 BY MR. BOUCHARD:</p> <p>8 Q. Mr. Vellani, is there any reason that you</p> <p>9 are not in a position today to offer clear and</p> <p>10 correct testimony?</p> <p>11 A. No, sir, I'm able to do that.</p> <p>12 Q. You're in a position to provide reliable</p> <p>13 and trustworthy testimony today?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Thank you, sir.</p> <p>16 Mr. Vellani, do you have a law degree?</p> <p>17 A. I do not.</p> <p>18 Q. Have you attended law school?</p> <p>19 A. No, sir.</p> <p>20 Q. Have you taken the bar exam in any of the</p> <p>21 50 states?</p> <p>22 A. No, sir.</p> <p>23 Q. Have you ever filed a lawsuit?</p> <p>24 A. No, sir.</p> <p>25 Q. I take it you've never stood up in court</p>

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<p>1 on behalf of a client as a lawyer representing a</p> <p>2 client?</p> <p>3 A. Let me back up. You say have I ever filed</p> <p>4 a lawsuit. My company filed a lawsuit which I'm the</p> <p>5 sole owner of. And I have stood up in court in</p> <p>6 front of a judge and dealt with that lawsuit.</p> <p>7 Q. Does that relate to business matters</p> <p>8 before your company?</p> <p>9 A. Yes, sir.</p> <p>10 Q. Other than that, any other lawsuits you've</p> <p>11 been involved with?</p> <p>12 A. No, sir.</p> <p>13 Q. Does the lawsuit pertain to your work as a</p> <p>14 security consultant?</p> <p>15 A. It was a small claim regarding unpaid</p> <p>16 bills.</p> <p>17 Q. Have you ever stood up in court on behalf</p> <p>18 of a client as an advocate for a client?</p> <p>19 A. No, sir.</p> <p>20 Q. Have you ever worked for the judiciary?</p> <p>21 A. No, sir.</p> <p>22 Q. For a judge?</p> <p>23 A. No, sir.</p> <p>24 Q. Or a court?</p> <p>25 A. Other than as an expert witness, no, sir.</p>	<p>1 Q. Are you a member of the American</p> <p>2 Hospitality and Lodging Association?</p> <p>3 A. No, sir.</p> <p>4 Q. The Asian American Hotel Owners</p> <p>5 Association?</p> <p>6 A. No, sir.</p> <p>7 Q. The Georgia Hospitality and Lodging</p> <p>8 Association?</p> <p>9 A. No, sir.</p> <p>10 Q. Have you ever attended any of the</p> <p>11 conferences put on by any of those hospitality trade</p> <p>12 groups or organizations that I just named?</p> <p>13 A. Not that I can recall, sir.</p> <p>14 Q. Do you have a medical degree?</p> <p>15 A. No, sir.</p> <p>16 Q. Have you attended medical school?</p> <p>17 A. No, sir.</p> <p>18 Q. Do you consider yourself an expert in</p> <p>19 medicine?</p> <p>20 A. No, sir.</p> <p>21 Q. Are you a psychiatrist?</p> <p>22 A. No, sir.</p> <p>23 Q. Are you a psychologist?</p> <p>24 A. No, sir.</p> <p>25 Q. Have you ever worked as a law enforcement</p>
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<p>1 Q. Do you consider yourself or hold yourself</p> <p>2 out to be an expert in the law?</p> <p>3 A. No.</p> <p>4 Q. Have you worked in the hospitality</p> <p>5 industry?</p> <p>6 A. I have provided consulting services in the</p> <p>7 hospitality industry. I've never been employed by a</p> <p>8 hotel.</p> <p>9 Q. And we'll talk about consulting services</p> <p>10 you provided to the hospitality industry later. But</p> <p>11 for now, you've never been employed by a hospitality</p> <p>12 services provider like a hotel, motel, or anything</p> <p>13 else?</p> <p>14 A. Correct.</p> <p>15 Q. Do you have experience in hotel</p> <p>16 operations?</p> <p>17 A. Through my consulting practice, yes, sir.</p> <p>18 Q. Do you consider yourself an expert in</p> <p>19 hotel operations?</p> <p>20 A. Well, the security operations, yes.</p> <p>21 Q. What about nonsecurity operations?</p> <p>22 A. I'm going to generally say no.</p> <p>23 Q. Are you a member of any hospitality trade</p> <p>24 groups or organizations?</p> <p>25 A. No, sir.</p>	<p>1 officer?</p> <p>2 A. No, sir.</p> <p>3 Q. Do you have law enforcement training?</p> <p>4 A. Yes, sir.</p> <p>5 Q. What training do you have?</p> <p>6 A. So my undergrad bachelor's degree is</p> <p>7 criminal justice with a specialization in law</p> <p>8 enforcement. I've also been trained by the Texas</p> <p>9 Commission on -- well, now it's called TCOLE --</p> <p>10 Texas Commission on Law Enforcement standards with</p> <p>11 respect to firearms training.</p> <p>12 Q. Any other law enforcement training?</p> <p>13 A. I've attended various trainings with</p> <p>14 respect to criminal profiling, gang crimes. And</p> <p>15 there might be some other ones listed on my CV.</p> <p>16 Q. That's all that's coming to mind right</p> <p>17 now, though?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Have you ever investigated a crime</p> <p>20 personally?</p> <p>21 A. Yes.</p> <p>22 Q. Which crimes? Can you tell me about that?</p> <p>23 A. Well, there are times in my consulting</p> <p>24 practice where I've had to do, you know, what I</p> <p>25 would consider to be HR-related investigations. I</p>

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<p>1 also worked as a private investigator before working</p> <p>2 for a consulting firm. So there were various</p> <p>3 different types of crimes.</p> <p>4 Q. Let me ask it this way: Have you ever</p> <p>5 investigated a crime as a law enforcement officer?</p> <p>6 A. No, sir.</p> <p>7 Q. Have you ever made an arrest?</p> <p>8 A. No, sir.</p> <p>9 Q. Do you consider yourself an expert in law</p> <p>10 enforcement?</p> <p>11 A. No, sir.</p> <p>12 Q. Have you ever worked as a service provider</p> <p>13 for sex trafficking victims or survivors?</p> <p>14 A. No, sir.</p> <p>15 Q. Have you ever worked for a sex trafficking</p> <p>16 survivors or victims organization?</p> <p>17 A. No, sir.</p> <p>18 Q. Have you ever interviewed a sex</p> <p>19 trafficking victim or survivor?</p> <p>20 A. I don't know that we were using those</p> <p>21 terms back in 2009. So given we weren't using those</p> <p>22 terms specifically, the answer would be no.</p> <p>23 Q. Who were you thinking of in 2009?</p> <p>24 A. So in 2009 I was hired by a law firm who</p> <p>25 was working for the mayor's office of Houston to</p>	<p>1 trafficking.</p> <p>2 So I think, you know, like law</p> <p>3 enforcement, they make an initial assumption on</p> <p>4 whether the person is a criminal or victim. But</p> <p>5 ultimately, it's the DA that makes that decision.</p> <p>6 Then I assume at some point it's the judge's</p> <p>7 decision.</p> <p>8 Q. Have you ever interviewed an individual</p> <p>9 who was engaged in commercial sex activity as a</p> <p>10 minor?</p> <p>11 A. Well, I don't know the ages of those</p> <p>12 people I was mentioning. So I don't know.</p> <p>13 Q. Have you ever worked on a sex trafficking</p> <p>14 case as a law enforcement officer?</p> <p>15 A. No, I've never been a law enforcement</p> <p>16 officer.</p> <p>17 Q. I understand that you worked for the</p> <p>18 Department of Homeland Security for 11 years. Can</p> <p>19 you tell me what your role there entailed, sir?</p> <p>20 A. Yeah, I didn't work directly for DHS.</p> <p>21 This actually was a project that started pre-9/11.</p> <p>22 It's an entity called Federal Protective Service</p> <p>23 which is now under Homeland Security. Previously it</p> <p>24 was under the General Services Administration. So</p> <p>25 what I did is -- this was, you know, early in my</p>
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<p>1 evaluate specific hotels where there was a lot of</p> <p>2 vice activity and potential sex trafficking going</p> <p>3 on. That was -- so that was 2009. It was on the</p> <p>4 heels of the Wilberforce TVPRA 2008 law. So during</p> <p>5 that time I did interview prostitutes. Whether they</p> <p>6 were trafficking victims or not, I don't know.</p> <p>7 That's not my call.</p> <p>8 Q. How many did you interview during that</p> <p>9 time in connection with that project that you're</p> <p>10 describing?</p> <p>11 A. Probably around half a dozen. Half a</p> <p>12 dozen to a dozen.</p> <p>13 Q. Have you interviewed any sex trafficking</p> <p>14 victims or survivors since that project that you're</p> <p>15 describing in 2009?</p> <p>16 A. No, sir.</p> <p>17 Q. You mentioned that it wasn't your call to</p> <p>18 determine whether they were prostitutes or sex</p> <p>19 trafficking victims. What did you mean by that?</p> <p>20 A. Well, obviously, we're dealing with -- in</p> <p>21 this situation we're dealing with the Texas penal</p> <p>22 code. So is not up to me to make that</p> <p>23 determination. Ultimately, I think that's the DA's</p> <p>24 decision as to whether to charge someone with, you</p> <p>25 know, being a prostitute or being a victim of sex</p>	<p>1 company's history. So I took a job working for a</p> <p>2 company called, SEG, Inc., as a quality control</p> <p>3 monitor wherein I would go to federal buildings</p> <p>4 across Texas initially and inspect the security</p> <p>5 officers that were assigned to those federal</p> <p>6 buildings that was everything from a federal</p> <p>7 building like the Murrah Federal Building in</p> <p>8 Oklahoma, that kind of building and everything down</p> <p>9 to a small little social security office that was</p> <p>10 next to a Walmart in some small town. So I</p> <p>11 inspected the security officers, ensuring they were</p> <p>12 in compliance with the contract and ensuring they</p> <p>13 were in compliance with the policies and procedures</p> <p>14 of the company. And inspected their morale,</p> <p>15 inspected their uniform. That kind of stuff. That</p> <p>16 eventually grew into a contract for my company where</p> <p>17 I believe we were in 23 states and on a monthly</p> <p>18 basis we were inspecting about 11- -- 1,000 to 1100</p> <p>19 officers every month across 700 federal buildings in</p> <p>20 23 states, and that varied over time.</p> <p>21 Q. Did your job consist of any other duties</p> <p>22 or responsibilities other than what you just</p> <p>23 described or is what you just provided a fair</p> <p>24 summary?</p> <p>25 A. No. That was the bulk of it. There were</p>

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<p align="right">Page 18</p> <p>1 times I had to go out and do an HR investigation. 2 In fact, that is what I was doing on 9/11 for work. 3 I was conducting an investigation that was related 4 to, you know, kind of a human resources type of an 5 issue. I have also assisted that company with 6 hiring security officers at the start of new 7 contracts. So there were some ancillary stuff that 8 happened during that 11 years, but the bulk of it 9 was what I mentioned. 10 Q. Do you hold yourself out as an expert in 11 sex trafficking? 12 A. I hold myself as an expert in crime 13 analysis and crime prevention wherein I look at 14 different types of crime. Sex trafficking being one 15 of them. But would I hold myself out as an expert 16 in sex trafficking exclusively? No. It would be 17 all within the confines of security and crime 18 prevention. 19 Q. Do I understand correctly, Mr. Vellani, 20 that you are a CPP and a CSC? 21 A. Yes, sir. 22 Q. I just want to ask you about those. What 23 is CPP? 24 A. So a CPP stands for Certified Protection 25 Professional. It's kind of a gold standard in the</p>	<p align="right">Page 20</p> <p>1 on a project and win a project. So it comes in 2 handy in that situation. I don't know anything, you 3 know, beyond that what it does. 4 Q. Does it enable you to conduct risk 5 assessments? 6 A. Well, risk assessments can be done without 7 a CPP. But, again, it depends on what the client's 8 requirements are. If they have a requirement for a 9 CPP to do a risk assessment at the property, then it 10 does. But most clients don't require that. 11 Q. Most clients, you're saying, interested in 12 a risk assessment do not require a CPP, is that 13 fair? 14 A. Yeah. I think probably 70 percent. Just 15 looking back on my consulting practice, probably 16 70 percent have no preference to the CPP whatsoever. 17 Probably about 25 percent have it as a preference 18 and maybe 5 percent require it. 19 Q. If a client came to you and said, "Hey, 20 we're looking at you considering you or we're also 21 considering somebody else who doesn't have a CPP to 22 conduct a risk assessment that we want done," what 23 would your opinion be about whether they would get 24 just as good a job from somebody who didn't have a 25 CPP as if they got it done from you?</p>
<p align="right">Page 19</p> <p>1 security industry. It is a certification that is 2 hosted by the -- by what's now called ASIS 3 International which used to be called American 4 Society for Industrial Security. It's the largest 5 security association in the world. Basically, it's 6 a self-study program where you can attend classes, 7 either hosted at the local chapter or at, you know, 8 headquarters, I guess, during the annual conference. 9 It took me about a year to study for it because I 10 did not want to fail the test. Took the test, 11 passed the test. And there's a recertification, I 12 think, every three years. 13 Q. Did you find it to be a fairly rigorous 14 process? 15 A. Very much. 16 Q. What does the CPP credential signify in 17 terms of what you're able to do? 18 A. Well, like I said, it's kind of the gold 19 standard for the security industry. I don't know 20 that it necessarily qualifies me to do anything. It 21 basically says I have this baseline of knowledge. 22 There are times when I'm bidding on 23 projects where they require a CPP. So, you know, 24 there are some clients that require it in order to 25 hire you or in order for you to be qualified to bid</p>	<p align="right">Page 21</p> <p>1 MR. ALLUSHI: Objection. 2 A. I don't -- I don't think the CPP has that 3 kind of power. I think the -- I think the quality 4 of the risk assessment is based on the quality of 5 the individual conducting the risk assessment. So 6 I've written extensively. Researched extensively. 7 I published a book and two editions and a third one 8 on the way regarding risk assessments. I think that 9 makes me far more qualified than a CPP would grant 10 me. I'm not trying to diminish the certification, 11 but I don't think it has the kind of power you're 12 suggesting it might have. 13 Q. Do you believe that the CPP qualifies you 14 to serve as a forensic security consultant? 15 A. No. It's not a requirement. 16 Q. What qualifies you to serve as a forensic 17 security consultant? 18 MS. RICHENS: Objection. 19 A. Ultimately, I think that's the judge's 20 decision, right? That's not my decision, it's not 21 your decision, that's not defense counsel's 22 decision. That's the judge's decision. The CPP 23 might play into the qualifications but I don't think 24 that's the end-all be-all. 25</p>

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<p align="right">Page 22</p> <p>1 BY MR. BOUCHARD:</p> <p>2 Q. And I'm not suggesting that it is. I'm</p> <p>3 just asking what do you believe qualifies you to</p> <p>4 serve as a forensic security consultant?</p> <p>5 A. So, again, if you look at my CV, number</p> <p>6 one, starting with the education, you know, I've got</p> <p>7 a bachelor's degree in criminal justice with a</p> <p>8 specialization in law enforcement. I have a</p> <p>9 master's degree in criminal justice management.</p> <p>10 I've got extensive experience including working for</p> <p>11 another expert witness when I first got into this</p> <p>12 business. You know, while an undergrad during an</p> <p>13 internship, I have published extensively in the area</p> <p>14 of security. I have written extensively, researched</p> <p>15 extensively in the field of crime prevention, crime</p> <p>16 analysis and security risk assessments. So that's</p> <p>17 probably the core of it.</p> <p>18 On top of that, I have the certifications.</p> <p>19 You know, on top of that I've been, you know,</p> <p>20 allowed to testify in court in I think 9 or 10</p> <p>21 trials.</p> <p>22 Q. Do you think research or publications</p> <p>23 aren't necessary to establish somebody as a forensic</p> <p>24 security consultant?</p> <p>25 A. So are you asking that in the eyes of the</p>	<p align="right">Page 24</p> <p>1 what that means and what it entails?</p> <p>2 A. Sure, so the CSC is a Certified Security</p> <p>3 Consultant. It is a certification that is hosted by</p> <p>4 the International Association of Professional</p> <p>5 Security Consultants. It basically demonstrates</p> <p>6 that you have the knowledge within the security</p> <p>7 consulting field and it looks at -- I don't know</p> <p>8 about today, but when it started it looked at three</p> <p>9 different domains. Physical security, security</p> <p>10 management and forensic security.</p> <p>11 Q. Have you been evaluated on all three of</p> <p>12 those domains or one but not the other? Can you</p> <p>13 explain that, please?</p> <p>14 A. Yes. I mean, you're taxing my brain here.</p> <p>15 I'm trying to remember the history of this. So as I</p> <p>16 recall, you're tested on all three domains plus</p> <p>17 ethics. So you certainly have to have a baseline</p> <p>18 knowledge in all three areas. But you most</p> <p>19 certainly had to excel at one or two of the areas in</p> <p>20 order to pass the test. I mean, in other words, you</p> <p>21 couldn't just have knowledge in one area and pass</p> <p>22 the test.</p> <p>23 Q. I understand. Which of those areas are</p> <p>24 you the strongest in? Which of those three are you</p> <p>25 the strongest in and which are you comparatively</p>
<p align="right">Page 23</p> <p>1 courts? Because, I mean --</p> <p>2 Q. No, I'm not. I'm asking that of</p> <p>3 Karim Vellani. I'm not asking you to speak as the</p> <p>4 court.</p> <p>5 A. So it is my belief that research and</p> <p>6 publishing is a critical requirement to show or to</p> <p>7 demonstrate that one is up to speed in their field</p> <p>8 of study. And can then, you know, testify as an</p> <p>9 expert witness. Is it a necessity? Not that I'm</p> <p>10 aware of. Because, obviously, at some point we all</p> <p>11 start off as an expert without those publications</p> <p>12 sometimes.</p> <p>13 Q. Do you agree that the CPP certification</p> <p>14 means that the applicant has demonstrated knowledge</p> <p>15 and competency in seven key domains of security?</p> <p>16 A. Yes, sir.</p> <p>17 Q. Do you agree that the CPP certification is</p> <p>18 globally recognized as the standard of excellence</p> <p>19 for security management professionals?</p> <p>20 A. It's certainly the marketing pitch for the</p> <p>21 ASIS.</p> <p>22 Q. Do you quibble with that or disagree with</p> <p>23 it?</p> <p>24 A. No, I don't disagree with it.</p> <p>25 Q. You also are a CSC. Can you tell me about</p>	<p align="right">Page 25</p> <p>1 weaker in?</p> <p>2 A. So I would say --</p> <p>3 (Zoom distortion.)</p> <p>4 A. -- security management -- well, at the</p> <p>5 time that I took the exam, I would say security</p> <p>6 management would be my strongest suit followed by</p> <p>7 forensic security followed by physical security and</p> <p>8 I think that's still true today.</p> <p>9 Q. Does the CSC, in your opinion,</p> <p>10 Mr. Vellani, qualify you to do things that the CPP</p> <p>11 that you also have does not qualify you to do?</p> <p>12 A. Well, again, you say "qualify." I mean,</p> <p>13 as independent security consultants, which I am, you</p> <p>14 know, it's in the eye of the buyer, right? So</p> <p>15 ultimately you are selling your services and if the</p> <p>16 client deems it necessary or preferential, then,</p> <p>17 yes. If they don't, then, no.</p> <p>18 Q. As a security professional, somebody who</p> <p>19 works in the security industry, in your opinion,</p> <p>20 does the CSC qualify you to do things that somebody</p> <p>21 without a CSC is not qualified to do?</p> <p>22 A. Again, I'm not the buyer, right? So if</p> <p>23 somebody is trying to hire me as a security</p> <p>24 consultant, they place value on the CSC. I don't</p> <p>25 get to make that decision. That's in the eye of the</p>

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<p>1 buyer.</p> <p>2 Q. Is it fair to say you don't have an</p> <p>3 opinion on that or you don't hold an opinion on</p> <p>4 that?</p> <p>5 MR. ALLUSHI: Objection.</p> <p>6 A. So I think the CSC is good. I think it's</p> <p>7 great. But, you know, I'm not the one that's doing</p> <p>8 the hiring, right? That is up to -- in the case of</p> <p>9 my consulting practice, that is up to my client to</p> <p>10 make that decision whether they hold value in that</p> <p>11 or, you know, in the case of litigation, whether the</p> <p>12 judge sees value in that.</p> <p>13 Q. I understand what you're saying. But I'm</p> <p>14 not asking for, you know, what your client might</p> <p>15 think or believe. I'm asking for what you think or</p> <p>16 believe. Do you have anything further to add or</p> <p>17 have you answered the question?</p> <p>18 MR. ALLUSHI: Objection.</p> <p>19 A. Well, like I mentioned, I think the CSC is</p> <p>20 a very good certification. I think the -- the fact</p> <p>21 that it requires, you know, much like the CPP, the</p> <p>22 CSC also requires recertification demonstrating, you</p> <p>23 know, experience, education, training, you know,</p> <p>24 presentations that you have given, participation in</p> <p>25 the industry. I think all of those things are a</p>	<p>1 Q. Have you spoken to Kikia Anderson?</p> <p>2 A. I don't know who that is, sir.</p> <p>3 Q. I take it then you have not asked to speak</p> <p>4 to her since you don't know who that is, is that</p> <p>5 fair?</p> <p>6 MR. ALLUSHI: Objection.</p> <p>7 A. Correct.</p> <p>8 BY MR. BOUCHARD:</p> <p>9 Q. Have you asked Kikia Anderson how often</p> <p>10 she trafficked minors at United Inn?</p> <p>11 MR. ALLUSHI: Again, I'm going to object</p> <p>12 to this. He said he doesn't know who that is.</p> <p>13 What's the point of asking the questions,</p> <p>14 David?</p> <p>15 MR. BOUCHARD: Adi, you can have a</p> <p>16 standing form objection to this line of</p> <p>17 questioning. That's fine.</p> <p>18 BY MR. BOUCHARD:</p> <p>19 Q. Have you asked Kikia Anderson how often</p> <p>20 she trafficked minors at the United Inn,</p> <p>21 Mr. Vellani?</p> <p>22 A. No, sir.</p> <p>23 Q. Have you asked her why she chose the</p> <p>24 United Inn?</p> <p>25 A. No, sir.</p>
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<p>1 good thing.</p> <p>2 BY MR. BOUCHARD:</p> <p>3 Q. Have you spoken to Plaintiff G.W. before?</p> <p>4 A. No, sir.</p> <p>5 Q. Have you ever asked to do so?</p> <p>6 A. No, sir.</p> <p>7 Q. Have you ever spoken to Plaintiff A.G.</p> <p>8 before?</p> <p>9 A. No, sir.</p> <p>10 Q. Have you asked to do so?</p> <p>11 A. No, sir.</p> <p>12 Q. Have you spoken to Zaccheus Obie.</p> <p>13 A. No, sir.</p> <p>14 Q. Have you asked to do so?</p> <p>15 A. No, sir.</p> <p>16 Q. Have you asked Zaccheus Obie how often he</p> <p>17 trafficked minors at the United Inn?</p> <p>18 A. No, sir.</p> <p>19 MR. ALLUSHI: Objection.</p> <p>20 BY MR. BOUCHARD:</p> <p>21 Q. Have you asked him why he chose the</p> <p>22 United Inn?</p> <p>23 MR. ALLUSHI: Objection.</p> <p>24 A. No, sir.</p> <p>25 BY MR. BOUCHARD:</p>	<p>1 Q. Have you spoken to Plaintiff J.G.?</p> <p>2 A. No, sir.</p> <p>3 Q. Have you asked to do so?</p> <p>4 A. No, sir.</p> <p>5 Q. Have you spoken to any of her alleged</p> <p>6 traffickers: Shaq, Shay, Cash or King?</p> <p>7 A. No, sir.</p> <p>8 Q. Have you asked to do so?</p> <p>9 A. No, sir.</p> <p>10 Q. Have you asked any of J.G.'s traffickers</p> <p>11 how often they trafficked minors at the United Inn?</p> <p>12 MS. RICHENS: Objection.</p> <p>13 A. No, sir.</p> <p>14 BY MR. BOUCHARD:</p> <p>15 Q. Have you asked any of J.G.'s traffickers</p> <p>16 why they chose the United Inn?</p> <p>17 MR. ALLUSHI: Objection.</p> <p>18 A. No, sir.</p> <p>19 BY MR. BOUCHARD:</p> <p>20 Q. Have you spoken to Ashar Islam?</p> <p>21 A. No, sir.</p> <p>22 Q. Have you asked to do so?</p> <p>23 A. I don't know. I don't think so.</p> <p>24 Q. I understand that you have spoken to</p> <p>25 Tahir Shareef?</p>

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<p>1 A. Yes, sir.</p> <p>2 Q. How many times have you spoken to</p> <p>3 Tahir Shareef?</p> <p>4 A. I believe it was just one time.</p> <p>5 Q. Have you personally visited the United</p> <p>6 Inn?</p> <p>7 A. Yes, sir.</p> <p>8 Q. I'm going to ask you about that a little</p> <p>9 bit later but just for now I wanted to ask have you</p> <p>10 stayed at the United Inn?</p> <p>11 A. No, sir.</p> <p>12 Q. Have you asked to stay at the United Inn?</p> <p>13 A. No, sir.</p> <p>14 Q. When did you first visit the United Inn?</p> <p>15 A. January 17, 2023.</p> <p>16 Q. So you never went to the United Inn in the</p> <p>17 years 2017, 2018, or 2019, is that correct?</p> <p>18 A. Correct.</p> <p>19 Q. Where did you stay when you came to</p> <p>20 Atlanta in January 2023?</p> <p>21 A. I don't know, sir. You know, I mean, I</p> <p>22 stayed in various hotels in Atlanta, depending where</p> <p>23 I got to be. I don't know where I stayed that</p> <p>24 particular trip.</p> <p>25 Q. But you know you did not stay at the</p>	<p>1 alleged in the complaints, is that fair?</p> <p>2 A. That's fair.</p> <p>3 Q. Are you going to provide an opinion at</p> <p>4 trial about whether Plaintiff G.W. is credible?</p> <p>5 A. No, sir.</p> <p>6 Q. What about whether Plaintiff J.G. is</p> <p>7 credible?</p> <p>8 A. No, sir.</p> <p>9 Q. Or whether Plaintiff A.G. is credible?</p> <p>10 A. No, sir.</p> <p>11 Q. Are you going to provide an opinion at</p> <p>12 trial about whether Tahir Shareef is credible?</p> <p>13 A. No, sir, I don't make credibility</p> <p>14 judgments.</p> <p>15 Q. I take it it's the same answer as to</p> <p>16 Ashar Islam?</p> <p>17 A. Correct.</p> <p>18 Q. We're going to talk about your expert</p> <p>19 reports here shortly, sir. But just at the outset</p> <p>20 before we get into them, I wanted to ask you are all</p> <p>21 of the opinions that you hold in the A.G., G.W., and</p> <p>22 J.G. cases set forth in your expert reports?</p> <p>23 A. Yes, sir.</p> <p>24 Q. Are there any opinions you're going to</p> <p>25 offer at trial that are not set forth in the expert</p>
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<p>1 United Inn?</p> <p>2 A. Correct.</p> <p>3 Q. Is that correct?</p> <p>4 Are you familiar or are you aware with</p> <p>5 internet websites that existed in 2017, 2018, and</p> <p>6 2019 to advertise sex for money?</p> <p>7 A. Some of them, yes.</p> <p>8 Q. Which of the websites are you familiar</p> <p>9 with, sir?</p> <p>10 A. Well, Backpage is the obvious answer. You</p> <p>11 know, there were some other ones. USA Sex Guide. I</p> <p>12 don't believe Craig's List was doing advertisements</p> <p>13 back then. But they might have been. You know,</p> <p>14 there's other ones. Rubmaps comes to mind.</p> <p>15 Q. Did you do any research as part of your</p> <p>16 engagement in this case about the United Inn on any</p> <p>17 of the websites you just mentioned?</p> <p>18 A. Well, Backpage didn't exist when I was</p> <p>19 engaged with this, when I was initially engaged with</p> <p>20 this lawsuit and I did not look at any of the other</p> <p>21 ones. It wouldn't do me any good, obviously, I'm</p> <p>22 four, five years removed from the time of the</p> <p>23 incident.</p> <p>24 Q. Mr. Vellani, you're, obviously, not</p> <p>25 claiming to be an eyewitness to any of the events</p>	<p>1 reports?</p> <p>2 A. I assume that you will be eliciting</p> <p>3 further opinions from me or sub-opinions to my</p> <p>4 primary opinion and certainly defense counsel may do</p> <p>5 the same. So I can't answer that definitively.</p> <p>6 What I can tell you is that whatever opinions you</p> <p>7 guys elicit, I would assume they would fall under</p> <p>8 the general opinion I've given already.</p> <p>9 Q. And as you're sitting here right now,</p> <p>10 you're not aware of any other new or different</p> <p>11 opinions that aren't already contained in your</p> <p>12 reports that you prepared in this case?</p> <p>13 A. That's correct.</p> <p>14 Q. Do you plan to provide an opinion at trial</p> <p>15 about whether plaintiffs were or were not trafficked</p> <p>16 at United Inn?</p> <p>17 A. I already stated that as a fact in the</p> <p>18 reports.</p> <p>19 Q. Do you plan to provide an opinion at trial</p> <p>20 about whether plaintiffs were minors engaging in sex</p> <p>21 for money at United Inn?</p> <p>22 A. I don't remember exactly how I worded it</p> <p>23 in the reports but I think I already acknowledged</p> <p>24 that factually they're victims of sex trafficking by</p> <p>25 virtue of their age.</p>

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<p align="right">Page 34</p> <p>1 Q. Will you provide an opinion at trial,</p> <p>2 Mr. Vellani, about whether sex trafficking was</p> <p>3 foreseeable at United Inn?</p> <p>4 A. So I don't -- you know, my opinion is</p> <p>5 contained in here in this -- these reports. And I</p> <p>6 don't use the word foreseeability in these reports.</p> <p>7 So the answer would be no. But, you know, again, if</p> <p>8 the judge asked me the question, I would certainly</p> <p>9 answer it.</p> <p>10 Q. Will you provide an opinion at trial about</p> <p>11 whether United Inn knew or should have known that</p> <p>12 plaintiffs were sex trafficking victims?</p> <p>13 A. I think I addressed that in my report as</p> <p>14 well. They certainly didn't have knowledge of it.</p> <p>15 Q. When you say that "they certainly didn't</p> <p>16 have knowledge of it," are you saying that, in fact,</p> <p>17 the defendant, United Inn and Suites, did not have</p> <p>18 knowledge of it, or are you saying based on your</p> <p>19 review of the discovery materials, you've concluded</p> <p>20 that they did not have knowledge of it?</p> <p>21 MR. ALLUSHI: Object to the form.</p> <p>22 A. The latter, but also the interview that I</p> <p>23 conducted. So based on the discovery materials that</p> <p>24 I reviewed, I see no evidence that they were aware</p> <p>25 of it. And also, I spoke to Mr. Shareef and I don't</p>	<p align="right">Page 36</p> <p>1 Q. Is that what your opinions, in your mind,</p> <p>2 Mr. Vellani, concern, that is, the standard of care?</p> <p>3 A. That would be the primary opinion, yes,</p> <p>4 would be the standard of care. But like I said,</p> <p>5 there may be -- there are certainly sub-opinions</p> <p>6 under that that I'm sure you'll elicit or defense</p> <p>7 counsel will elicit.</p> <p>8 Q. Will you provide an opinion at trial about</p> <p>9 whether defendant should or should not be found</p> <p>10 liable for the causes of action set forth in the</p> <p>11 complaints?</p> <p>12 A. Seems like a jury decision to me.</p> <p>13 MR. ALLUSHI: Object to the form.</p> <p>14 BY MR. BOUCHARD:</p> <p>15 Q. Will you provide an opinion at trial about</p> <p>16 whether plaintiffs have suffered damages?</p> <p>17 A. No, sir.</p> <p>18 Q. Will you provide an opinion at trial about</p> <p>19 the adequacy of plaintiffs' allegations?</p> <p>20 A. I'm going to say no, but I don't know what</p> <p>21 you're saying. Adequacy of their allegations?</p> <p>22 Q. The suspicion -- let me try to rephrase</p> <p>23 that.</p> <p>24 Will you provide an opinion at trial,</p> <p>25 Mr. Vellani, about whether plaintiffs have</p>
<p align="right">Page 35</p> <p>1 see any -- he didn't know about any of this.</p> <p>2 BY MR. BOUCHARD:</p> <p>3 Q. I asked you previously if you're planning</p> <p>4 to offer credibility determinations at trial. Do</p> <p>5 you recognize that if there's a divergence between</p> <p>6 what the plaintiffs say and what Tahir Shareef or</p> <p>7 Ashar Islam say on behalf of United Inn and Suites,</p> <p>8 the fact finder in the case, that is the jury, may</p> <p>9 have to make a credibility determination?</p> <p>10 A. Yes, I understand that.</p> <p>11 Q. Are you intending to come into the</p> <p>12 courtroom as an expert and say I vouch for the</p> <p>13 credibility of Tahir Shareef and what he told me?</p> <p>14 MR. ALLUSHI: Objection.</p> <p>15 A. No, sir.</p> <p>16 BY MR. BOUCHARD:</p> <p>17 Q. I didn't hear your answer.</p> <p>18 A. No, sir.</p> <p>19 Q. Do you intend to provide an opinion at</p> <p>20 trial about whether United Inn had certain duties</p> <p>21 under the law?</p> <p>22 A. I mean, that sounds like a legal analysis</p> <p>23 that I would have to do. So I would say generally</p> <p>24 no. What my opinions would be -- would be regarding</p> <p>25 the standard of care.</p>	<p align="right">Page 37</p> <p>1 sufficiently alleged their causes of action in order</p> <p>2 to -- for United Inn to be found liable?</p> <p>3 MR. ALLUSHI: Objection.</p> <p>4 A. I'm going to say no. I don't fully</p> <p>5 understand what you're saying but...</p> <p>6 BY MR. BOUCHARD:</p> <p>7 Q. Mr. Vellani, do you have your expert</p> <p>8 reports printed out in front of you or do you have</p> <p>9 them otherwise available?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Okay. Are you going to be referring to</p> <p>12 the electronic copies or paper copies?</p> <p>13 A. The electronic copies.</p> <p>14 Q. And you're comfortable with the</p> <p>15 electronic, sir?</p> <p>16 A. Certainly more so than paper.</p> <p>17 Q. I am, too, but not everybody is of that</p> <p>18 stripe. So I just wanted to confirm.</p> <p>19 A. Yes, sir.</p> <p>20 Q. I'm going to identify your expert report</p> <p>21 in the J.G. matter as Exhibit 1.</p> <p>22 (Thereupon, marked as Plaintiff</p> <p>23 Exhibit 1.)</p> <p>24 MR. BOUCHARD: Your expert report in the</p> <p>25 A.G. matter as Exhibit 2.</p>

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<p>1 (Thereupon, marked as Plaintiff</p> <p>2 Exhibit 2.)</p> <p>3 MR. BOUCHARD: And your expert report in</p> <p>4 the G.W. matter as Exhibit 3.</p> <p>5 (Thereupon, marked as Plaintiff</p> <p>6 Exhibit 3.)</p> <p>7 BY MR. BOUCHARD:</p> <p>8 Q. Mr. Vellani, I'll represent that the</p> <p>9 reports I have seen that I have copies of are dated</p> <p>10 June 14, 2023.</p> <p>11 A. Yes, sir.</p> <p>12 Q. Are those the most up-to-date reports that</p> <p>13 you have prepared?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Have you made any changes to your reports</p> <p>16 since June 14th, 2023?</p> <p>17 A. No, sir.</p> <p>18 Q. Do you agree that the opinions provided in</p> <p>19 Exhibits 1, 2, and 3, that is, the J.G. report, the</p> <p>20 A.G. report, and the G.W. report are identical</p> <p>21 opinions?</p> <p>22 A. The opinions are identical. The actual</p> <p>23 reports are not entirely identical.</p> <p>24 Q. What are the differences between the</p> <p>25 reports in the three cases?</p>	<p>1 that I set the three reports down and went through</p> <p>2 them and my list is very similar to yours. Let me</p> <p>3 just kind of compare and confirm here, if I can.</p> <p>4 A. Sure.</p> <p>5 Q. Looking at the table of contents for</p> <p>6 Plaintiffs' Exhibit 1 which is the J.G. report, I</p> <p>7 believe that the following sections have some</p> <p>8 differences across the three reports. The materials</p> <p>9 received section?</p> <p>10 A. Yes, sir.</p> <p>11 Q. The subject incident background section?</p> <p>12 A. Yes, sir.</p> <p>13 Q. The analysis of crime at the United Inn</p> <p>14 and Suites section?</p> <p>15 A. Yes, sir.</p> <p>16 Q. The awareness section?</p> <p>17 A. I don't know if there was a difference</p> <p>18 there. Was there? Let me take a quick look at</p> <p>19 that, if you don't mind. Give me one second, sir.</p> <p>20 Q. No problem.</p> <p>21 A. Yeah, I mean, there's a difference there</p> <p>22 because that's referring to that knocking loudly on</p> <p>23 the door. Yeah. There is a difference there.</p> <p>24 Q. And the last section, referring back to</p> <p>25 the table of contents, where I saw a difference</p>
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<p>1 A. Well, I'm going to go from mostly memory</p> <p>2 here. But I'll also flip through them. Obviously,</p> <p>3 the material reviewed is different in each case. Or</p> <p>4 at least the difference between A.G., G.W., and then</p> <p>5 separately, J.G.'s got, you know, different</p> <p>6 documents. The background section for each incident</p> <p>7 is different. Each is, you know, specific to each</p> <p>8 of the plaintiffs. There was the issue with J.G.</p> <p>9 when the police were on-site that is specifically</p> <p>10 addressed. There is the incident with respect to</p> <p>11 the period -- the period for the crime analysis that</p> <p>12 I looked at would be different based on the period</p> <p>13 of trafficking. Because each -- all three were</p> <p>14 different. The crime history on the property which</p> <p>15 would be within the scope of my crime analysis are</p> <p>16 different because the trafficking periods are</p> <p>17 different. A.G. and G.W. have that specific</p> <p>18 incident and the people knocking on their door. You</p> <p>19 know, that didn't apply to the J.G. report. So</p> <p>20 that's different. There's also that situation where</p> <p>21 A.G. and G.W. lost the key, their guest room key.</p> <p>22 So that would be different and wouldn't apply to</p> <p>23 J.G. So those are -- I think I've hit all the</p> <p>24 differences.</p> <p>25 Q. So I can represent to you, Mr. Vellani,</p>	<p>1 between the three reports, was the guest management</p> <p>2 section. Do you agree with that?</p> <p>3 A. Is that regarding the -- yeah, that's the</p> <p>4 difference with the lost room key, yes, sir.</p> <p>5 Q. I'm not aware based on my review of the</p> <p>6 reports of any other sections that are different</p> <p>7 between the three reports. Does my summary there</p> <p>8 seem reasonable to you, Mr. Vellani?</p> <p>9 A. Yes, sir. Well. Let me back up. The</p> <p>10 Appendix C is different.</p> <p>11 Q. Yes, sir. That's correct. I missed that.</p> <p>12 And I appreciate the clarification. Any other</p> <p>13 sections other than the ones I've listed and what</p> <p>14 you just flagged that you're aware of?</p> <p>15 A. I don't think so.</p> <p>16 Q. Looking at page 1 and, again, because the</p> <p>17 majority of the sections across the three reports</p> <p>18 are similar, or identical, rather, Mr. Vellani, I'm</p> <p>19 going to generally be referring to Exhibit 1 which</p> <p>20 is Plaintiff J.G.'s report, okay?</p> <p>21 A. Okay.</p> <p>22 Q. Where there are differences between the</p> <p>23 three reports, I will perhaps ask you specific</p> <p>24 questions about those differences. And if you're</p> <p>25 aware of differences that are relevant to the</p>

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<p>1 questions I'm asking, I would like you to raise</p> <p>2 those differences with me. Is that fair?</p> <p>3 A. That's fair.</p> <p>4 Q. Just a quick question on page 1 of</p> <p>5 Exhibit 1, sir, you say "This report may be</p> <p>6 supplemented as additional discovery is made</p> <p>7 available and other case activity is completed."</p> <p>8 You've mentioned that the reports dated</p> <p>9 June 14th are the most up to date and they have not</p> <p>10 been updated since then. As you sit here today, do</p> <p>11 you intend to supplement the June 14th reports?</p> <p>12 A. Only if there's additional discovery that</p> <p>13 I got access to. As of right now, there is nothing</p> <p>14 else.</p> <p>15 Q. Are there any materials you needed to</p> <p>16 prepare your reports that you did not receive?</p> <p>17 A. No, sir.</p> <p>18 Q. And I take it --</p> <p>19 A. Let me be clear about one thing. There is</p> <p>20 no other discovery. There is other research that</p> <p>21 I've looked at since these reports were published.</p> <p>22 So those other studies I think you were provided a</p> <p>23 list of the human trafficking references. There is</p> <p>24 a couple studies in there that I may address. But</p> <p>25 that's certainly not part of the discovery in this</p>	<p>1 A. So, I mean, let me kind of back up and</p> <p>2 give you my recollection of that project. So a law</p> <p>3 firm called -- that was retained by the mayor's</p> <p>4 office, I went downtown, met with them. They</p> <p>5 explained what the concerns were, what the project</p> <p>6 was, what they wanted me to ultimately do. So as I</p> <p>7 recall, I treated it no different than I do any of</p> <p>8 my other security risk assessment projects which</p> <p>9 means that I started with evaluating the crime</p> <p>10 statistics for the individual hotels that I was</p> <p>11 looking at. So I pulled the -- requested the</p> <p>12 current data from Houston Police Department for the</p> <p>13 specific hotels, did a deep dive on -- I can't</p> <p>14 remember in 2009 if that was, like, offense data or</p> <p>15 call for service data, but regardless, it was some</p> <p>16 kind of raw data. Pulled that data, analyzed that</p> <p>17 data. And then I went back and requested police</p> <p>18 reports on specific incidents. I recall at some</p> <p>19 point going to the property, spending a lot of time</p> <p>20 at these different hotels. And then as I mentioned,</p> <p>21 I also interviewed some of the, you know, the</p> <p>22 prostitutes that were working that area.</p> <p>23 I also interviewed some of the hotel</p> <p>24 managers and hotel staff that were working there. I</p> <p>25 went back at night, did an assessment.</p>
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<p>1 case.</p> <p>2 Q. And I take it your answer as to your</p> <p>3 intent to supplement your report and any materials</p> <p>4 you needed that you have not received would be the</p> <p>5 same for the A.G. and G.W. reports, is that correct?</p> <p>6 A. Correct.</p> <p>7 Q. Mr. Vellani, let's take a look at page 3,</p> <p>8 the second paragraph of page 3, and we're looking at</p> <p>9 Plaintiffs' Exhibit 1 which is the J.G. report.</p> <p>10 Page 3, paragraph 2. Which starts, "Karim's</p> <p>11 practical experience in mitigating sex</p> <p>12 trafficking..." Do you see that, sir?</p> <p>13 A. Yes, sir.</p> <p>14 Q. You're familiar with that paragraph, of</p> <p>15 course?</p> <p>16 A. Yes, sir.</p> <p>17 Q. What sex trafficking stress and</p> <p>18 vulnerabilities, to use the language from paragraph</p> <p>19 two here did you identify at specific hotels in</p> <p>20 Houston?</p> <p>21 A. I'm sorry. What specific threats and</p> <p>22 vulnerabilities?</p> <p>23 Q. What sex trafficking threats and</p> <p>24 vulnerabilities did you identify at specific hotels</p> <p>25 in Houston?</p>	<p>1 So ultimately -- because this was for a</p> <p>2 number of different hotels. There were several</p> <p>3 different crime analyses that were done. One for</p> <p>4 each one. And then one generally for the area that</p> <p>5 we were looking at. So that was the threat</p> <p>6 assessment part.</p> <p>7 The vulnerability assessment was unique to</p> <p>8 each individual hotel. Some of these were motels,</p> <p>9 some of them were hotels. Some of them had, like,</p> <p>10 a -- I want to say like a motor court. The one that</p> <p>11 I'm thinking of, you drove into, you know, you drove</p> <p>12 in off the street into an enclosed parking area and</p> <p>13 it was enclosed by the structural buildings. The</p> <p>14 actual buildings of the motel. So some of them had</p> <p>15 night windows only. Some of them had different</p> <p>16 signage. Some of them had a front desk that was</p> <p>17 accessible by guests, some of them were not. So the</p> <p>18 vulnerabilities were unique to each one. The threat</p> <p>19 assessment was also unique to each one.</p> <p>20 Q. How do you distinguish between a threat</p> <p>21 assessment and vulnerability assessment?</p> <p>22 A. So there is -- basically, if you you've</p> <p>23 ever looked at my books, Strategic Security</p> <p>24 Management, there is a five-step process for</p> <p>25 evaluating risks. Step number one is to identify</p>

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<p align="right">Page 46</p> <p>1 what we're trying to protect. That's the asset 2 identification. The second thing is the threat 3 assessment. That means what are we protecting 4 against. So threat assessment, what are we 5 protecting against? 6 The third part is an evaluation of the 7 security measures in place. 8 And the fourth part is the vulnerability 9 assessment which is where you're looking for the 10 gaps in the security program. 11 And then ultimately it culminates in the 12 fifth step which is the risk assessment itself. So 13 threats are, you know, what we're protecting against 14 and vulnerabilities are the gaps or weaknesses in 15 the security program. 16 Q. In looking back at Exhibit 1, your report, 17 in the J.G. matter, it says that you, quote -- I'm 18 changing the verb tense here -- "identified threats 19 and vulnerabilities at specific hotels..." 20 Do you see that? 21 A. Yes, sir. 22 Q. What do you mean, like, what did you 23 identify? 24 A. So like I said, I pulled -- for the threat 25 assessment part, you know, obviously, I listened to</p>	<p align="right">Page 48</p> <p>1 entailed, you know, various types of vice crimes. 2 I'm sure there were some of those hotels that 3 actually had prostitution or arrests. And in the -- 4 specifically, I mean, with respect to the 5 vulnerabilities, all I can recall is that I came up 6 with a list of evidence-based measures that would 7 work to try to thwart -- like, for example, some of 8 those hotels were renting by the hour. So that was 9 something that ultimately was in my report that they 10 needed to change. 11 But as far as what the specific 12 vulnerabilities were, you know, I don't recall a 13 whole lot of them other than that one that keeps 14 coming to mind where I can envision, you know, the 15 driving in from the street and having only that one 16 access point which was a good thing. But, 17 unfortunately, it was being used in a nefarious way. 18 BY MR. BOUCHARD: 19 Q. Did you prepare and submit a report with 20 your findings to the City of Houston? 21 A. I don't know if I submitted a report in 22 writing. I recall going back down to the -- going 23 back downtown and meeting with the attorneys and 24 giving them some documentation regarding 25 evidence-based practices. But I don't know if I</p>
<p align="right">Page 47</p> <p>1 the client about what their concerns were. I 2 listened to the hotels about what their concerns 3 were. Whether it was, you know, clerks, hotel staff 4 or management. I pulled the crime data for the 5 property. And then secondly, the vulnerability 6 assessment is where I actually went on-site, 7 conducted interviews, reviewed the security measures 8 in place at each hotel. And then further refined 9 the threat assessment based on specific concerns I 10 heard from staff and management on-site. 11 Q. So I appreciate -- as I understand your 12 answer, you're sort of walking me through the 13 process and procedure you followed to prepare your 14 analysis? 15 A. Yes, sir. 16 Q. My question is intended to get more at 17 what the conclusions were as it relates to threats 18 and vulnerabilities. And I understand they were 19 hotel specific. But can you give me some examples, 20 please, of your conclusions as to the threats and 21 vulnerabilities at the hotels you were involved with 22 looking at. 23 MR. ALLUSHI: Objection. 24 A. We're talking 15 years ago. I don't 25 recall the specific threats. I can imagine they</p>	<p align="right">Page 49</p> <p>1 actually wrote a report or they wrote the report. I 2 don't recall that. 3 Q. You say in the same paragraph here that 4 you developed methods for mitigating the risk of sex 5 trafficking and vice crimes. Can you tell me what 6 methods you developed for mitigating the risk of sex 7 trafficking and vice crimes? 8 A. Well, the one that comes to mind is the 9 hourly rentals. That was probably the -- that's the 10 thing that's sticking in my mind. You know, what 11 the other ones were, I don't recall off the top of 12 my head. I mean, that was -- you know, there's -- 13 unfortunately, there's a dearth of research with 14 respect to what works and what doesn't. So it's 15 possible I gave them some recommendations regarding, 16 you know, crime prevention meetings, working with 17 the police. I think I recall -- again, this is 15 18 years ago -- so I think I recall giving them 19 information about working with the police not 20 requiring warrants in order to give the guest 21 registry access to the rooms and video surveillance 22 for those hotels that had video surveillance. Not 23 all of them did. 24 Q. And I understand we're talking about 25 events 15 years ago and you're doing your best to</p>

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<p align="right">Page 50</p> <p>1 recall and I appreciate that.</p> <p>2 Are there any other methods that as you're</p> <p>3 sitting here right now you can recall or have you</p> <p>4 exhausted your memory?</p> <p>5 A. Yeah, I've exhausted my memory, sir. If</p> <p>6 anything else come to mind, I'll let you know.</p> <p>7 Q. Other than the work you did for the City</p> <p>8 of Houston in 2009, what other practical experience,</p> <p>9 to use the language here that you used in</p> <p>10 paragraph 2, do you have mitigating sex trafficking</p> <p>11 at lodging facilities?</p> <p>12 A. Well, so, you know, most of my work is</p> <p>13 consulting. Not litigation. So litigation stuff</p> <p>14 only started a couple years ago with respect to sex</p> <p>15 trafficking specifically. So a lot of my clients</p> <p>16 have hotels on their properties. So when I conduct</p> <p>17 a security risk assessment, these are one of the</p> <p>18 conceptual threats that I look at. In other words,</p> <p>19 you know, what is the risk of your hotel being used</p> <p>20 for prostitution or sex trafficking. So that would</p> <p>21 have been throughout the course of my, you know,</p> <p>22 practice. Most of the work that I've done recently,</p> <p>23 probably the most notable work is in the healthcare</p> <p>24 field. Not so much in the hotels. But with respect</p> <p>25 to hotels, it would just be on an ongoing basis as I</p>	<p align="right">Page 52</p> <p>1 A. Well, the stakeholder would be ultimately</p> <p>2 the people that are, you know, responsible for</p> <p>3 managing the place. So the police are not</p> <p>4 necessarily my client. They're not the stakeholders</p> <p>5 as I'm using the term.</p> <p>6 Q. Tell me if I'm misstating or</p> <p>7 misunderstanding. As I understand your testimony a</p> <p>8 moment ago, Mr. Vellani, you're saying that you have</p> <p>9 conducted a number of risk assessments for hotel</p> <p>10 properties that include consideration of the risk of</p> <p>11 sex trafficking or commercial sex activity on the</p> <p>12 property?</p> <p>13 A. Yes, sir. It's -- yes.</p> <p>14 Q. So my next question is, approximately how</p> <p>15 many of those types of risk assessments have you</p> <p>16 performed?</p> <p>17 A. Specifically for hotels?</p> <p>18 Q. Yeah, of that specific type of risk</p> <p>19 assessments for hotels that include consideration of</p> <p>20 sex trafficking risks?</p> <p>21 A. I don't know that I can break it down by</p> <p>22 hotel over the years. But, you know, this is</p> <p>23 something that has -- you know, obviously, working</p> <p>24 with the city was somewhat -- well, it was very</p> <p>25 informative for me that this was a concern. And</p>
<p align="right">Page 51</p> <p>1 evaluate different properties.</p> <p>2 You know, one of the things that I'm</p> <p>3 looking for in hotels or even residential</p> <p>4 environments, you know, because most trafficking</p> <p>5 actually, according to the data, occurs in</p> <p>6 residential environments, not in hotels. So even in</p> <p>7 the apartment complexes that I evaluate, that is</p> <p>8 something I'm looking for, you know, to see if it's</p> <p>9 a concern.</p> <p>10 So when I review the crime history, you</p> <p>11 know, primarily what I'm doing is I'm driving --</p> <p>12 using the crime history of the property and the</p> <p>13 concerns expressed by stakeholders to drive the</p> <p>14 analysis that I'm conducting. So if a hotel is</p> <p>15 telling me that they've got a concern about this,</p> <p>16 then that's one of the issues I'll look at. If they</p> <p>17 tell me they're only concerned about burglaries in</p> <p>18 motor vehicles, that's what I'm looking at. I'm not</p> <p>19 necessarily looking at prostitution or sex</p> <p>20 trafficking.</p> <p>21 But I don't know if I've answered your</p> <p>22 question.</p> <p>23 Q. I think you have. Do you consider the</p> <p>24 police to be stakeholders? Or who counts as a</p> <p>25 stakeholder?</p>	<p align="right">Page 53</p> <p>1 then, obviously, understanding what the FBI or what</p> <p>2 the Department of Justice did in 2008 with the</p> <p>3 Wilberforce TVPRA. It has always been an ongoing</p> <p>4 concern for me throughout the years as I conduct</p> <p>5 these assessments. But, you know, every year is a</p> <p>6 little different for me. I mean, some years I'm</p> <p>7 doing more consulting with hospitals. Some years</p> <p>8 I'm doing more consulting with shopping centers,</p> <p>9 retail stores. Some years are more heavy on, you</p> <p>10 know, multi- -- with -- with mixed-use properties</p> <p>11 which include hotels.</p> <p>12 So, you know, is it something I'm working</p> <p>13 on every single year in terms of actual consulting?</p> <p>14 No. Is it something that I'm researching, you know,</p> <p>15 every year? Yes. But I can't tell you, like, the</p> <p>16 number of hotels that I've looked at over the years.</p> <p>17 I mean, in it's been 15 years. You know, I don't</p> <p>18 know the answer.</p> <p>19 Q. Are you able to provide me with an</p> <p>20 approximate range of how many? In other words, is</p> <p>21 it more than 10? Is it more than 25? Is it more</p> <p>22 than 50? Is it more than 100? Can you give me an</p> <p>23 approximate range?</p> <p>24 A. I don't know. I mean, I'd have to go back</p> <p>25 and look at the different projects because a lot of</p>

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<p align="right">Page 54</p> <p>1 these projects are for large property owners that</p> <p>2 own multiple different types of properties within a,</p> <p>3 you know, single plot of land so to speak. So the</p> <p>4 ones that's coming to mind, they have a mall.</p> <p>5 They've got commercial office buildings. They have</p> <p>6 residential buildings. They have hotels. You know,</p> <p>7 so I don't know the number. I'd have to go back and</p> <p>8 think about that.</p> <p>9 Q. Well, because this is the only opportunity</p> <p>10 I have to depose you in advance of trial,</p> <p>11 Mr. Vellani, I'm trying to get, as best I can, an</p> <p>12 understanding of your expertise, experience,</p> <p>13 education, and so forth.</p> <p>14 A. Yes, sir.</p> <p>15 Q. And I know you understand that because</p> <p>16 you've been through discovery before.</p> <p>17 Can you tell me, have you conducted more</p> <p>18 than 10 risk assessments for hotels that include</p> <p>19 consideration of sex trafficking risks?</p> <p>20 A. Yes, sir. I answered yes. More than 10,</p> <p>21 yes. Somewhere between 10 and 100. I'd have to go</p> <p>22 back and look, like I said.</p> <p>23 Q. And is that something that you've done in</p> <p>24 recent years or is that something that you were</p> <p>25 doing in 2009 in that period but you've stopped</p>	<p align="right">Page 56</p> <p>1 developed programs for identifying and responding to</p> <p>2 sex trafficking victims in the hospitality</p> <p>3 environment?</p> <p>4 A. Not specifically in the hospitality. I</p> <p>5 have researched on hospitality in order to establish</p> <p>6 a standard of care. I have written and published on</p> <p>7 healthcare.</p> <p>8 Q. In paragraph 3 towards the bottom, the</p> <p>9 last sentence of paragraph 3 says that you've worked</p> <p>10 on projects, and you list different customers or</p> <p>11 clients, as I understand it, that you've worked on</p> <p>12 projects with as a consultant. Is that correct?</p> <p>13 A. Yes, sir.</p> <p>14 Q. And you list hotels and motels towards the</p> <p>15 end.</p> <p>16 A. Yes, sir.</p> <p>17 Q. Have you told me about the projects, to</p> <p>18 use your language, that you have worked on for</p> <p>19 hotels and motels? Or are there other projects that</p> <p>20 we haven't discussed that you're referring to there?</p> <p>21 A. I think we've covered it.</p> <p>22 Q. I was interested that it said you've</p> <p>23 worked on projects for financial institutions, too.</p> <p>24 What are those projects?</p> <p>25 A. Banks. Looking at the -- primarily the --</p>
<p align="right">Page 55</p> <p>1 doing?</p> <p>2 A. No. It's been an ongoing thing. I still</p> <p>3 got clients with those kinds of properties.</p> <p>4 Q. On page 3, looking at the same paragraph</p> <p>5 of Exhibit 1, it says that you've researched and</p> <p>6 published on sex trafficking mitigation and</p> <p>7 developed programs for identifying responding to sex</p> <p>8 trafficking victims in various environments, notably</p> <p>9 in the healthcare environment. Do you see that?</p> <p>10 A. Yes, sir.</p> <p>11 Q. There's two footnotes on the bottom of the</p> <p>12 page and both appear to be references to</p> <p>13 publications that are for healthcare environments.</p> <p>14 Is that fair?</p> <p>15 A. Correct.</p> <p>16 Q. Have you researched and published on sex</p> <p>17 trafficking mitigation and environments other than</p> <p>18 the healthcare environment?</p> <p>19 A. Researched, yes. Published, those are my</p> <p>20 only two articles with respect to sex trafficking.</p> <p>21 One of them addresses -- I think actually both of</p> <p>22 them may address hotels as well, but they're focused</p> <p>23 on healthcare.</p> <p>24 Q. Using the language that you're using here</p> <p>25 in paragraph 2 of Plaintiffs' Exhibit 1, have you</p>	<p align="right">Page 57</p> <p>1 so sometime back we had written an article I believe</p> <p>2 I coauthored with someone else on ATM security. So</p> <p>3 because of that article I've gotten calls and been</p> <p>4 retained by banks to evaluate their crime on their</p> <p>5 property. There's a law in Texas that requires</p> <p>6 every operator of an ATM to review their crime on an</p> <p>7 annual basis at the properties. So I've done that.</p> <p>8 I've also done vulnerability assessments of banks.</p> <p>9 Q. Take a look at page 5 of Exhibit 1 which</p> <p>10 is the materials received section, Mr. Vellani.</p> <p>11 A. Yes, sir.</p> <p>12 Q. And I take it that all the materials that</p> <p>13 you received and reviewed are listed here on page 5?</p> <p>14 A. I believe so. I don't think there's any</p> <p>15 that's come in after this.</p> <p>16 Q. Is that the same for Exhibits 2 and 3,</p> <p>17 A.G. and G.W.'s reports?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Is it your testimony that you have</p> <p>20 received and reviewed all of the documents produced</p> <p>21 in discovery in this case, whether by the plaintiffs</p> <p>22 or by United Inn or a third party?</p> <p>23 A. Listen, I think all experts are hamstrung</p> <p>24 by what the attorneys give them and don't give them.</p> <p>25 So it is my understanding that I have everything.</p>

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<p style="text-align: right;">Page 58</p> <p>1 But I don't know that anything was withheld from me.</p> <p>2 Q. I wanted to ask you just a few questions</p> <p>3 about the materials that you considered that are</p> <p>4 listed here on page 5, Mr. Vellani. In the course</p> <p>5 of your review of materials that you received for</p> <p>6 preparation of your reports, Exhibits 1, 2, and 3,</p> <p>7 did you seek background check documentation on</p> <p>8 United Inn employees?</p> <p>9 A. No, sir.</p> <p>10 Q. When you work as a consultant with hotels,</p> <p>11 do you recommend that they conduct background checks</p> <p>12 on the staff that they hire?</p> <p>13 A. Yes, sir. The short answer is yes.</p> <p>14 Q. Do you consider that to be a security</p> <p>15 industry standard?</p> <p>16 MR. ALLUSHI: Objection.</p> <p>17 A. To conduct a background check on</p> <p>18 employees? Yes.</p> <p>19 BY MR. BOUCHARD:</p> <p>20 Q. Why is that?</p> <p>21 A. Again, let me be clear about this. I'm</p> <p>22 not aware of any written standard that requires it</p> <p>23 unless you adopt such a standard. It's certainly a</p> <p>24 good practice to do a background check on your</p> <p>25 employees or if you're, you know, an apartment</p>	<p style="text-align: right;">Page 60</p> <p>1 Q. Did you ask to interview hotel staff?</p> <p>2 A. I did not. We were five years removed</p> <p>3 from the incident. So I did not.</p> <p>4 Q. Do you personally know that hotel staff</p> <p>5 working at the hotel in 2017 through 2019 spoke</p> <p>6 English?</p> <p>7 MR. ALLUSHI: Objection.</p> <p>8 A. I think I had asked Mr. Shareef about</p> <p>9 that. And either that -- or the deposition -- it</p> <p>10 was either the deposition or during the interview</p> <p>11 that I -- that question came up. Whether it was by</p> <p>12 you or by me. My understanding, or my recollection</p> <p>13 was that, you know, the staff spoke a sufficient</p> <p>14 amount of English to get by to do their job.</p> <p>15 BY MR. BOUCHARD:</p> <p>16 Q. That's your understanding based on what</p> <p>17 Mr. Shareef told you?</p> <p>18 A. Yes. As I recall, again, whether he told</p> <p>19 me or said in a deposition, I don't recall where</p> <p>20 that came up.</p> <p>21 Q. Do you know how many people were on staff</p> <p>22 at the hotel in 2017?</p> <p>23 A. Yeah, he talked about that. I asked</p> <p>24 specifically about, you know, the day shift. So on</p> <p>25 page 15 they were five housekeepers, one front desk</p>
<p style="text-align: right;">Page 59</p> <p>1 complex, your residents. So it's certainly good</p> <p>2 practices but I'm not aware of any standard which</p> <p>3 requires it.</p> <p>4 Q. Why do you recommend to your hospitality</p> <p>5 clients that they conduct background checks on their</p> <p>6 staff?</p> <p>7 A. Primarily because you're concerned about,</p> <p>8 you know, fiduciary responsibilities, right? I</p> <p>9 mean, if you got somebody that's got, you know, a</p> <p>10 history of theft of money or credit card fraud and</p> <p>11 things like that, you know, you want to try to keep</p> <p>12 those people out of it -- out of the, you know, out</p> <p>13 of your employment.</p> <p>14 In the situation with respect to</p> <p>15 trafficking, or prostitution, you know, one of the</p> <p>16 concerns would be that they've got a background in</p> <p>17 vice crimes. So conducting a criminal background</p> <p>18 check is certainly a good idea.</p> <p>19 Q. Did you -- as part of the materials</p> <p>20 received in preparation for your expert reports, did</p> <p>21 you interview hotel staff or review interview notes</p> <p>22 of hotel staff interviews?</p> <p>23 A. I'm not aware of any hotel staff interview</p> <p>24 notes. The only person that I've interviewed in</p> <p>25 this case is Mr. Shareef.</p>	<p style="text-align: right;">Page 61</p> <p>1 person, a groundskeeper. So that's seven. And then</p> <p>2 at night there was two, the police officer when the</p> <p>3 police officer was there. Otherwise, it was just</p> <p>4 the night shift clerk.</p> <p>5 Q. And you're -- as I understand it, your</p> <p>6 answer is about how many people were working at a</p> <p>7 given time of day at the hotel. I'm asking do you</p> <p>8 know how many people were on staff generally at the</p> <p>9 hotel in 2017?</p> <p>10 A. Well, I mean, I think that would -- this</p> <p>11 would give us nine plus the owner.</p> <p>12 Q. Well, do you think that those people were</p> <p>13 working seven days a week?</p> <p>14 MR. ALLUSHI: Objection.</p> <p>15 A. No. What I'm saying is what -- either in</p> <p>16 the deposition or in the interview, he gave me a</p> <p>17 list of all the staff members by title and the count</p> <p>18 by title. So, no, I don't think they were working</p> <p>19 seven days a week. They might have been. I have no</p> <p>20 idea. What I was trying to get from him -- I think</p> <p>21 these came from the interview notes -- was where I</p> <p>22 got these numbers from.</p> <p>23 BY MR. BOUCHARD:</p> <p>24 Q. When you say interview notes, are you</p> <p>25 saying of your interview of Mr. Shareef?</p>

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<p>1 A. Yes, sir.</p> <p>2 Q. Did you personally ask Mr. Shareef</p> <p>3 questions?</p> <p>4 A. Yes, sir.</p> <p>5 Q. And you recorded notes of the interview?</p> <p>6 A. I put notes into the report which</p> <p>7 ultimately became part of my report.</p> <p>8 Q. Do you have notes independent of your</p> <p>9 report from the interview?</p> <p>10 A. No, sir. Everything was incorporated. So</p> <p>11 I had a working document that ultimately turned into</p> <p>12 the report.</p> <p>13 Q. Okay. So other than the nine people</p> <p>14 referenced on page 15 of your expert reports, you're</p> <p>15 not aware of whether there were any other staff</p> <p>16 members at United Inn in 2017?</p> <p>17 A. No, and I should say 10. 10, 10 people</p> <p>18 including the second police officer. I mean, again,</p> <p>19 if we're trying to get a total number, I think 10.</p> <p>20 10 would be about the right number. If we're not</p> <p>21 including Mr. Shareef himself who was there</p> <p>22 sometimes.</p> <p>23 Q. What I would like to do is include</p> <p>24 Mr. Shareef but I would not like to include the</p> <p>25 police officers who worked off duty. I'm talking</p>	<p>1 A. So I don't have a specific recollection of</p> <p>2 any list. I guess it might have shown up in some of</p> <p>3 the discovery responses. But I don't recall</p> <p>4 specifically seeing that.</p> <p>5 Q. So you do not recall seeing lists of who</p> <p>6 worked at the hotel, is that correct?</p> <p>7 MR. ALLUSHI: Objection.</p> <p>8 A. Again, it's possible that a list existed</p> <p>9 in one of the discovery responses but I don't have a</p> <p>10 specific recollection of the list right now.</p> <p>11 Q. Have you -- and I take it the answer is no</p> <p>12 based on your answer there but tell me if I'm wrong.</p> <p>13 Have you compared lists of staff produced by</p> <p>14 United Inn in discovery in this case?</p> <p>15 A. Compared it to what?</p> <p>16 Q. To each other, the different lists of</p> <p>17 hotel staff?</p> <p>18 A. Yes, again, I don't have any specific</p> <p>19 recollection. So I don't know if there are</p> <p>20 different lists or whether there is even a list. I</p> <p>21 don't know.</p> <p>22 Q. When you are working as a security</p> <p>23 consultant with a hotel that's hired you to provide,</p> <p>24 for example, a risk assessment, Mr. Vellani, is it</p> <p>25 important for you to understand who works at the</p>
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<p>1 about hotel staff. Not those who contracted with</p> <p>2 the hotel.</p> <p>3 A. Sure.</p> <p>4 Q. How many did you understand, based on your</p> <p>5 interview of Mr. Shareef, were on hotel staff in</p> <p>6 2017?</p> <p>7 A. So based on your guidance with that</p> <p>8 question, you've got one in terms of the owner.</p> <p>9 You've got the manager. You've got five</p> <p>10 housekeepers. You've got the front desk person who</p> <p>11 may or may not be the same as the owner or manager.</p> <p>12 And then you got the groundskeepers. So that's</p> <p>13 five, six, seven, eight, nine?</p> <p>14 Q. And is your understanding that the</p> <p>15 staffing was the same in 2018 and 2019?</p> <p>16 A. You know, I don't -- I certainly didn't</p> <p>17 ask them to break it down by year. So I don't know</p> <p>18 the answer. I think when I asked the question, you</p> <p>19 know, we didn't narrow it down for each year. So I</p> <p>20 don't know the answer to that. I don't know if he</p> <p>21 had the years where he had less staffing or years</p> <p>22 where he had more staff.</p> <p>23 Q. Have you reviewed lists of who worked at</p> <p>24 the hotel from 2017 to 2019 in the course of your</p> <p>25 review of discovery materials in this case?</p>	<p>1 hotel?</p> <p>2 MR. ALLUSHI: Objection.</p> <p>3 A. What do you mean by who works, like by</p> <p>4 name?</p> <p>5 BY MR. BOUCHARD:</p> <p>6 Q. Is it important for you to know how many</p> <p>7 people work at the hotel?</p> <p>8 A. Well, some of those people play greater</p> <p>9 importance, right? Like, I'm not really that</p> <p>10 concerned with the groundskeeper. I'm more</p> <p>11 concerned about the staff working in the hotel. You</p> <p>12 know, the staff, the housekeepers, the number of</p> <p>13 housekeepers, the number of people working at the</p> <p>14 front desk. But I don't really get bogged down by,</p> <p>15 you know, the number of groundskeepers, for example,</p> <p>16 or maintenance people. So yes, I do ask the</p> <p>17 question. I do have that information but I can't</p> <p>18 think of a place where it actually has a lot of</p> <p>19 relevance like the number of housekeepers or the</p> <p>20 number of groundskeepers.</p> <p>21 Q. But the number of housekeepers or the</p> <p>22 number of people working at the front desk or in a</p> <p>23 security-related function, is that important to you</p> <p>24 in connection with a risk assessment?</p> <p>25 A. It can be. I mean, it depends on the</p>

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<p>1 nature of the engagement. If they're concerned</p> <p>2 about burglaries of motor vehicles or auto thefts in</p> <p>3 the parking lot, I'm far less concerned about the</p> <p>4 staff members in the office. I'm more concerned</p> <p>5 about the number of people that are engaged in the</p> <p>6 parking lot. Whether it's a security officer or,</p> <p>7 you know, front desk staff that's working out into</p> <p>8 the parking lot. So it depends on the nature of the</p> <p>9 assessment.</p> <p>10 Q. If you were working for a hotel that asked</p> <p>11 you to do a risk assessment and as part of that</p> <p>12 assessment you were considering the risk of sex</p> <p>13 trafficking, would it concern you if the hotel gave</p> <p>14 you different lists of staff with different numbers</p> <p>15 of staff members on it?</p> <p>16 MR. ALLUSHI: Objection.</p> <p>17 BY MR. BOUCHARD:</p> <p>18 Q. Go ahead, Mr. Vellani.</p> <p>19 A. I'm sorry. Would it concern me if they</p> <p>20 gave me different lists? I've not experienced that.</p> <p>21 Q. Okay. So have you ever been in a</p> <p>22 situation as a consultant advising a hotel on risks</p> <p>23 related to sex trafficking where you've had</p> <p>24 difficulty getting information from the hotel about</p> <p>25 who worked at the hotel?</p>	<p>1 BY MR. BOUCHARD:</p> <p>2 Q. If a hotel had done background checks, you</p> <p>3 would expect them to maintain records of them?</p> <p>4 A. Yes. It depends on how they're doing it,</p> <p>5 right? Because they're a lot of portals that are</p> <p>6 used now. You know, the example I'm thinking of is</p> <p>7 where they have already got an established criteria</p> <p>8 set up with the background check company and they</p> <p>9 simply get a pass or fail and that's sometimes</p> <p>10 through an online portal. So is it ideal that they</p> <p>11 would print off a copy of that or somehow save the</p> <p>12 report and put it in the personnel file, yes. But I</p> <p>13 certainly have come across circumstances where the</p> <p>14 criminal background check would be through the</p> <p>15 portal and they didn't save a record of it. They</p> <p>16 just have to go back into the portal if they still</p> <p>17 have access.</p> <p>18 Q. Did you interview Detective Weber?</p> <p>19 A. Did I interview him? I don't think I</p> <p>20 interviewed the police officers. I don't know. I</p> <p>21 don't think I did.</p> <p>22 Q. Did you ask to?</p> <p>23 A. No. I think they -- I think, because I</p> <p>24 got the affidavits, that kind of satisfied my needs.</p> <p>25 Q. Have you seen in the course of your review</p>
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<p>1 MR. ALLUSHI: Objection.</p> <p>2 A. Well, I mean, keep in mind that you're</p> <p>3 asking me about something that I'm doing in the</p> <p>4 moment. I don't think I have ever experienced where</p> <p>5 someone has given me -- having difficulty telling me</p> <p>6 who is in their employ right now at the time of the</p> <p>7 assessment because it's in realtime. You know, they</p> <p>8 may have forgotten someone, I suppose. But -- and</p> <p>9 they may have clarified later on or when I go</p> <p>10 on-site, you know, I find an extra staff member</p> <p>11 there they hadn't mentioned during the telephone</p> <p>12 interview that occurred before I went on-site. But,</p> <p>13 you know, we're talking about in the moment when I'm</p> <p>14 doing a risk assessment. I'm not doing this five</p> <p>15 years in the past.</p> <p>16 BY MR. BOUCHARD:</p> <p>17 Q. But if the hotel that you were working</p> <p>18 with had been doing background checks, they should</p> <p>19 have records of that, you agree, of who they had</p> <p>20 conducted background checks on in order to gain</p> <p>21 employment at their hotel?</p> <p>22 MR. ALLUSHI: Objection.</p> <p>23 A. You mean they should have had records of</p> <p>24 it? Are you asking me if they should have had</p> <p>25 records?</p>	<p>1 of the discovery materials and materials in this</p> <p>2 case, have you seen a do not rent list?</p> <p>3 A. I don't know that I've seen one. I mean,</p> <p>4 I certainly asked about it but I don't know that</p> <p>5 I've actually seen it. I don't recall seeing it. I</p> <p>6 don't know if it was, you know, an exhibit to one of</p> <p>7 the depositions. I don't recall seeing one.</p> <p>8 Q. In the course of your review of discovery</p> <p>9 materials, did you see nightly security</p> <p>10 documentation or reports from the hotel security</p> <p>11 that worked from 10:00 p.m. to 2:00 a.m.?</p> <p>12 A. No, sir.</p> <p>13 Q. Did you see any sign-in/sign-out sheets</p> <p>14 for trainings of hotel staff?</p> <p>15 A. No, sir.</p> <p>16 Q. Did you see any documents showing which</p> <p>17 hotel staff received trainings?</p> <p>18 A. No, sir.</p> <p>19 Q. Did you review United Inn's guilty plea to</p> <p>20 the DeKalb County code enforcement violations?</p> <p>21 A. I'm aware of it. I don't know that I've</p> <p>22 seen documentation regarding it.</p> <p>23 Q. Did you review a missing person notice</p> <p>24 relating to Plaintiff J.G.?</p> <p>25 A. Again, I can go back through my file and</p>

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<p>1 see if I've actually seen it. I want to say that I</p> <p>2 have but I don't recall specifically.</p> <p>3 MR. BOUCHARD: This is probably a good</p> <p>4 time to take a break and go off the record.</p> <p>5 THE VIDEOGRAPHER: Okay. The time on the</p> <p>6 monitor is 10:54 a.m. and we're off the record.</p> <p>7 (Recess 10:54 a.m. until 11:14 a.m.)</p> <p>8 THE VIDEOGRAPHER: The time on the monitor</p> <p>9 is 11:14 a.m. We are back on the record.</p> <p>10 BY MR. BOUCHARD:</p> <p>11 Q. Mr. Vellani, I wanted to ask, have you</p> <p>12 seen an affidavit from a young woman named Nova who</p> <p>13 says that she was at the United Inn and Suites with</p> <p>14 J.G.?</p> <p>15 A. That does not sound familiar.</p> <p>16 Q. If you can take a look at page 6 of</p> <p>17 Plaintiffs' Exhibit 1, sir, which I'll represent to</p> <p>18 you the language I'm going to point you to from</p> <p>19 page 6 of Exhibit 1 is also contained in Exhibits 2</p> <p>20 and 3 where you talk about on January 17th</p> <p>21 conducting a day and night inspection and on</p> <p>22 May 25th interviewing Tahir Shareef. Do you see</p> <p>23 that, sir?</p> <p>24 A. Yes, sir.</p> <p>25 Q. I would like to start with the day and</p>	<p>1 A. I don't know, sir. It was after dark.</p> <p>2 That's all I recall.</p> <p>3 Q. Was it before midnight?</p> <p>4 A. I'm sure it was before midnight, yes.</p> <p>5 Q. Okay. And what was the purpose of going</p> <p>6 back at night?</p> <p>7 A. Sometimes I just like to get a feel for an</p> <p>8 area at night. Not necessarily the property, but</p> <p>9 the area.</p> <p>10 Q. You said you're sure it was before</p> <p>11 midnight. Do you think it was before 9:00 p.m.?</p> <p>12 A. I couldn't tell you, sir. You know, I</p> <p>13 couldn't tell you what time it was.</p> <p>14 Q. Okay. You described what you did when you</p> <p>15 went at 1:00 p.m. And I wanted to just kind of</p> <p>16 start there and we'll talk about night and then</p> <p>17 at -- is there anything else that you did when you</p> <p>18 went to the property that afternoon around 1:00 p.m.</p> <p>19 that you haven't told me?</p> <p>20 A. No, sir.</p> <p>21 Q. Okay. When you went back at night -- you</p> <p>22 said you can't remember exactly when you went back</p> <p>23 but it was before midnight -- what did you do when</p> <p>24 you went back at night?</p> <p>25 A. Just get a feel for the area. The traffic</p>
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<p>1 night inspection. Can you tell me what that</p> <p>2 consisted of?</p> <p>3 A. Yes. So I think the day inspection I went</p> <p>4 out there at about 1:00 p.m., spent some time at the</p> <p>5 property. Went and looked around the entirety of</p> <p>6 the property. Walked it, drove it, looked for</p> <p>7 concealment opportunities. I think at that point I</p> <p>8 had known that J.G. said she had sex in a car in the</p> <p>9 parking lot. So I was looking for concealment</p> <p>10 opportunities. I was looking at the breezeways</p> <p>11 where the front door -- I'm sorry -- where the front</p> <p>12 office was. The number of access points to the</p> <p>13 property. And then I went and drove the area to get</p> <p>14 an understanding of, you know, what else was in the</p> <p>15 area. I may have known about the other hotels in</p> <p>16 the area. Stone Mountain Inn and that kind of</p> <p>17 thing. And the gas stations. But, you know, that's</p> <p>18 kind of my routine is to go look at the area. And</p> <p>19 then I went back to the hotel that afternoon and</p> <p>20 then I went back at night to go and just see what it</p> <p>21 looked like at night. I mean, I didn't go out there</p> <p>22 and try to look at lighting and try to assume what</p> <p>23 I'm seeing today or that day was the same I would</p> <p>24 have seen, you know, back in '17, '18.</p> <p>25 Q. What time of night did you go back?</p>	<p>1 in the area. You know, look at the lights. The</p> <p>2 problem with doing the lighting inspection five</p> <p>3 years later just doesn't make a lot of sense, right?</p> <p>4 Especially nowadays people doing LED upgrades. What</p> <p>5 I see in place today is not the same thing I would</p> <p>6 necessarily see back five years ago because of the</p> <p>7 LED upgrades that people are typically engaging in</p> <p>8 nowadays.</p> <p>9 Q. Is there anything else you did when you</p> <p>10 went back at night?</p> <p>11 A. No, sir.</p> <p>12 Q. Where were you physically positioned when</p> <p>13 you went back at night?</p> <p>14 A. Well, I drove the property again. So I</p> <p>15 drove by the property, drove onto the property. I</p> <p>16 don't recall sitting there and, you know. I do</p> <p>17 recall sitting there during the day and just</p> <p>18 observing the property. You know, from the front</p> <p>19 parking lot pretty much directly in front of the</p> <p>20 office. I didn't do that at night. The lighting,</p> <p>21 you know, the night thing was mostly about the</p> <p>22 lighting.</p> <p>23 Q. How long were you on the property in the</p> <p>24 afternoon when you arrived about 1 o'clock? When</p> <p>25 did you leave the property?</p>

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<p>1 A. Well, like I said, I was at the property.</p> <p>2 Then I drove the area. Then I went back to the</p> <p>3 property. So I would say the totality of that was</p> <p>4 probably a couple of hours.</p> <p>5 Q. Does that mean two hours, approximately,</p> <p>6 or what does that mean to you?</p> <p>7 A. I don't know. You can look at my invoice</p> <p>8 and possibly figure it out. I don't --</p> <p>9 Q. What about -- sorry. Go ahead.</p> <p>10 A. I don't know the answer, I guess is the</p> <p>11 short answer. Well, I've got -- yeah. It was</p> <p>12 probably at least a couple hours. At night, I don't</p> <p>13 remember it being very long. Maybe 15 minutes.</p> <p>14 Q. Did you take any notes from your visits to</p> <p>15 the property that afternoon or that night?</p> <p>16 A. I would have probably taken, like, a keep</p> <p>17 note like a Google Keep note. I don't know. The</p> <p>18 short answer is I don't know. If I did, I would</p> <p>19 have taken them in a Google Keep app and then</p> <p>20 transferred them to, you know, what ultimately</p> <p>21 became my report.</p> <p>22 Q. You're saying any notes that you took</p> <p>23 during your site inspection at the United Inn would</p> <p>24 be incorporated in your report?</p> <p>25 A. Yes. If I had taken any notes, yes, sir.</p>	<p>1 opportunities for concealment in the parking lot. I</p> <p>2 looked at the layout of the structure. Like I told</p> <p>3 you, you know, with that 2009 project, one of the</p> <p>4 things that stood out was you drive in off a public</p> <p>5 street and you drive into kind of a motor court and</p> <p>6 park your car there and go to a registration window.</p> <p>7 And, you know, so similar to this, I'm just looking</p> <p>8 for how is this thing laid out, where the cameras</p> <p>9 are. Opportunities for concealment. Where, you</p> <p>10 know, light fixture are. Where the front desk is</p> <p>11 relative to, you know, the entrance. What</p> <p>12 visibility they have from just the front desk alone.</p> <p>13 So there was nothing specific. I didn't go look at</p> <p>14 door locks or anything on the units or anything like</p> <p>15 that.</p> <p>16 Q. Did you go in any of the rooms?</p> <p>17 A. I did not go in any of the rooms, no.</p> <p>18 Q. Did you go into the office?</p> <p>19 A. I went by the window. I'm not sure if the</p> <p>20 office was open back then. You know, it was kind</p> <p>21 of, I guess, the tail end of COVID. Maybe we're</p> <p>22 still at the tail end. I don't know where we're at.</p> <p>23 But I did not go into the office. I went to the</p> <p>24 front desk. I walked the breezeways. I walked the</p> <p>25 stairs. I walked around to the back. That kind of</p>
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<p>1 Q. Did you take any photos or videos?</p> <p>2 A. I did take photos. I don't think I took</p> <p>3 any videos. The photos are more -- mostly, like,</p> <p>4 they're not necessarily security features. They're</p> <p>5 mostly documentation that I was there.</p> <p>6 Q. And I take it that photos and/or videos</p> <p>7 that you took are not incorporated in your report?</p> <p>8 A. No, sir.</p> <p>9 Q. How many did you take, do you think?</p> <p>10 A. Probably, like, five or six. Usually the</p> <p>11 first thing I do is take a picture of some signage</p> <p>12 indicating where I'm at so when I go back and review</p> <p>13 the photos, you know, I've got kind of that</p> <p>14 benchmark.</p> <p>15 Q. Okay. So going back to your reports</p> <p>16 referenced to "I conducted a day and night</p> <p>17 inspection of the United Inn and Suites." Have you</p> <p>18 described for me what that consisted of or are there</p> <p>19 any other things that you did as part of that</p> <p>20 inspection that you have not told me about?</p> <p>21 A. No. I gave you kind of the broad brush of</p> <p>22 what I did that day.</p> <p>23 Q. Well, is there anything specific you</p> <p>24 haven't mentioned that you did that day?</p> <p>25 A. Well, like I said, I mean, I looked at the</p>	<p>1 thing.</p> <p>2 Q. Fair to say that you tried to walk around</p> <p>3 the common areas of the hotel?</p> <p>4 A. That would be fair. It's a better way of</p> <p>5 saying it than what I said.</p> <p>6 Q. And you've told me you can't remember</p> <p>7 where you stayed that night, is that correct?</p> <p>8 A. Yeah, I don't recall where I stayed. I</p> <p>9 mean, I typically stay at, you know, I stay --</p> <p>10 typically, most of the time I stay at a hotel near</p> <p>11 the airport. It all depends on where I've got to</p> <p>12 be, you know, during the course of that trip. You</p> <p>13 know, so I'll be out there again in a couple weeks</p> <p>14 and I'm staying at a completely different hotel than</p> <p>15 where I normally stay. So...</p> <p>16 Q. And I believe you said this. My memory is</p> <p>17 not perfect so forgive me if I'm repeating myself.</p> <p>18 Other than the January 17th visit that we've talked</p> <p>19 about, have you ever visited the United Inn and</p> <p>20 Suites?</p> <p>21 A. No, sir.</p> <p>22 Q. You also say here on page 6 that on</p> <p>23 May 25th you interviewed Tahir Shareef to learn more</p> <p>24 about the security program in place at United Inn</p> <p>25 and Suites. Do you see that?</p>

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<p align="right">Page 78</p> <p>1 A. Yes, sir.</p> <p>2 Q. And I believe we've touched on that a bit.</p> <p>3 And my understanding is, correct me if I'm wrong,</p> <p>4 that you did take notes during that interview but</p> <p>5 your notes are incorporated into the reports that</p> <p>6 you prepared in the three matters, is that correct?</p> <p>7 A. Yes, sir.</p> <p>8 Q. Where did that interview occur? I take it</p> <p>9 you were not at the United Inn for that interview?</p> <p>10 A. No. It was by Zoom or Teams or some video</p> <p>11 chat program.</p> <p>12 Q. What time of day was it? Do you recall?</p> <p>13 A. No.</p> <p>14 Q. Do you recall how long it was?</p> <p>15 A. It was at least a couple of hours. You</p> <p>16 know, that kind of interview takes at least a couple</p> <p>17 of hours.</p> <p>18 Q. Who participated?</p> <p>19 A. That is an excellent question. It --</p> <p>20 certainly one or more of the attorneys was on the</p> <p>21 call as well. Who it was, it might have been Will</p> <p>22 Story, it may have been Don Brown. Dana may have</p> <p>23 been on it. I don't recall who was on it</p> <p>24 specifically. I was not alone with them, I guess,</p> <p>25 is my point.</p>	<p align="right">Page 80</p> <p>1 Q. During that time period, did United Inn</p> <p>2 have security guards on the property 24 hours a day?</p> <p>3 A. No, sir.</p> <p>4 Q. During that time period, did United Inn</p> <p>5 have security guards on the property outside of</p> <p>6 10:00 p.m. to 2:00 a.m.?</p> <p>7 A. No, sir.</p> <p>8 Q. During that time period --</p> <p>9 A. Well, let me be clear. Let me be clear.</p> <p>10 I believe the officers in their affidavits stated</p> <p>11 they would adjust those times. Either the officers</p> <p>12 in their affidavits said that or Mr. Shareef told me</p> <p>13 this, that they wouldn't necessarily -- it wasn't</p> <p>14 always 10:00 p.m. to 2:00 a.m. It would fluctuate</p> <p>15 based on the needs of the property. If I'm not</p> <p>16 mistaken, that should be in my reports.</p> <p>17 Q. But I take it if Mr. Shareef's testimony</p> <p>18 or the affidavits differ on that point, you would</p> <p>19 defer to what the affidavits and Mr. Shareef's</p> <p>20 testimony say?</p> <p>21 A. Yes, sir.</p> <p>22 Q. During that time period, did United Inn</p> <p>23 require security guards to submit daily reports</p> <p>24 about their security patrols?</p> <p>25 A. So let's be clear here, these are not</p>
<p align="right">Page 79</p> <p>1 Q. What I'm trying to understand is, is the</p> <p>2 entirety of what you learned from Mr. Shareef in</p> <p>3 that interview recorded in Exhibits 1 through 3?</p> <p>4 A. Yes, sir.</p> <p>5 Q. So in other words, it's not like you're</p> <p>6 going to come into trial and say, well, Mr. Shareef</p> <p>7 told me X, Y, Z, it's not in my reports but I</p> <p>8 remember that he also told me that. Is that fair?</p> <p>9 A. That's fair.</p> <p>10 Q. All right. Okay. And so what you learned</p> <p>11 about the security program at the United Inn as</p> <p>12 you've said is incorporated in your report already</p> <p>13 through that call?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Based on that interview that you had on</p> <p>16 May 25th and your review of certain discovery</p> <p>17 materials in the case, Mr. Vellani, I want to ask</p> <p>18 you just some questions about your understanding of</p> <p>19 United Inn's security measures in effect from 2017</p> <p>20 to 2019. Okay?</p> <p>21 A. Okay.</p> <p>22 Q. During that time period and -- again, I'm</p> <p>23 going to be asking about the time period 2017 to</p> <p>24 2019 -- did United Inn have a gate to the property?</p> <p>25 A. No, sir.</p>	<p align="right">Page 81</p> <p>1 security guards. These are off-duty police</p> <p>2 officers, just for clarity. The typical things that</p> <p>3 off-duty police officers do is different than what</p> <p>4 security officers do. So the answer to your</p> <p>5 question is no, the police officers did not do</p> <p>6 reports on a daily basis like a security officer</p> <p>7 would. My understanding is they communicated via</p> <p>8 phone and text directly with Mr. Shareef about any</p> <p>9 issues or the manager that was on duty if there was</p> <p>10 an immediate issue.</p> <p>11 Q. Have you reviewed the phone logs and the</p> <p>12 text logs to determine the frequency of the</p> <p>13 communications?</p> <p>14 A. No, sir.</p> <p>15 Q. You said there's a difference between</p> <p>16 having security guards and having off-duty cops.</p> <p>17 What did you mean by that?</p> <p>18 A. Number one, I used the term security</p> <p>19 officer. Not security guard. There are things that</p> <p>20 are common practices amongst security officers that</p> <p>21 are different from the way off-duty police officers</p> <p>22 approach things. Off-duty police officers typically</p> <p>23 are focused on, you know, crime prevention and</p> <p>24 responding to crimes. They don't typically have</p> <p>25 written post orders. Security companies oftentimes</p>

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<p>1 do. You know, security officers will often times</p> <p>2 have what's called a patrol audit system or a guard</p> <p>3 tour system. That is not something police officers</p> <p>4 typically do. So there are differences in the way</p> <p>5 they approach, you know, whatever the problem is, or</p> <p>6 whatever their role is. So I wouldn't expect the</p> <p>7 police officers as a matter of good practice to, you</p> <p>8 know, do written daily activity reports, for</p> <p>9 example.</p> <p>10 Q. And your point there about patrol audits</p> <p>11 actually ties in with a question I was about to ask</p> <p>12 you. Which is during that time period, did</p> <p>13 United Inn require or receive patrol audit</p> <p>14 information from the off-duty police officers who</p> <p>15 worked from 10:00 p.m. to 2:00 a.m. at the hotel?</p> <p>16 A. Let's make sure we're talking about the</p> <p>17 same thing. A patrol audit system is basically</p> <p>18 where you've got sensors all over the property that</p> <p>19 you scan. Either QR codes, bar codes, something</p> <p>20 like that. Or you've got some kind of GPS tracking</p> <p>21 that they use to track where the officers are. I'm</p> <p>22 not aware of any such system existing in United Inn.</p> <p>23 It is possible there may have been a system on the</p> <p>24 police officers' patrol cars that allowed for GPS</p> <p>25 tracking. It is also possible they had some kind of</p>	<p>1 on their employees?</p> <p>2 MR. ALLUSHI: Objection. Go ahead.</p> <p>3 A. So my understanding was that most of his</p> <p>4 employees were either known to him or came to him by</p> <p>5 way of referrals from other hotel operators. So</p> <p>6 from those folks, he told me that they did not</p> <p>7 conduct criminal background checks. What he told me</p> <p>8 on the other folks is that he would do criminal</p> <p>9 background investigations.</p> <p>10 BY MR. BOUCHARD:</p> <p>11 Q. Your testimony is that he told you that he</p> <p>12 would conduct background checks on certain of his</p> <p>13 employees?</p> <p>14 A. On people that were not known to him or</p> <p>15 directly referred to him by another hotel operator</p> <p>16 or calling someone from one of the associations.</p> <p>17 Q. But you did not see any proof or</p> <p>18 documentation of such background checks, is that</p> <p>19 correct?</p> <p>20 MR. ALLUSHI: Objection.</p> <p>21 A. No, sir, I did not. As I explained, you</p> <p>22 know, the way background checks are done nowadays,</p> <p>23 you can either get a formal report from the</p> <p>24 background check company or you can -- in some</p> <p>25 instances you can log in to a portal and get access</p>
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<p>1 GPS tracking on their cell phones. But I'm not</p> <p>2 aware of anything that United Inn required or</p> <p>3 provided in that regard.</p> <p>4 Q. During that time period, did United Inn</p> <p>5 have one United Inn employee working at the property</p> <p>6 from 9:00 p.m. to 6:00 a.m.?</p> <p>7 A. That's my understanding, yes, sir.</p> <p>8 Q. During that time period, did United Inn</p> <p>9 have one United Inn employee working on the property</p> <p>10 for five hours during the night without any off-duty</p> <p>11 police officers also working?</p> <p>12 A. Going to make me do my math. 9:00 to</p> <p>13 6:00 is what we're talking about. 9:00 p.m. to</p> <p>14 6:00 a.m. is what we're talking about minus the four</p> <p>15 hours, right? So six, seven, eight, nine, minus</p> <p>16 four, that's five hours, yes, sir.</p> <p>17 Q. During the time period, 2017 to 2019, did</p> <p>18 United Inn conduct a formal assessment, formal</p> <p>19 risk -- assessment, excuse me, of the property?</p> <p>20 A. My understanding is they only did an</p> <p>21 informal risk assessment of the property.</p> <p>22 Q. And I think you've answered this, but to</p> <p>23 be clear, during that time period, based on your</p> <p>24 interview of Mr. Shareef and your review of the</p> <p>25 documents, did United Inn conduct background checks</p>	<p>1 to the reports without necessarily printing or</p> <p>2 saving the report. Or in some cases you can just go</p> <p>3 into a county website and go do the background check</p> <p>4 yourself.</p> <p>5 BY MR. BOUCHARD:</p> <p>6 Q. During that time period, did United Inn</p> <p>7 pay some of their employees in cash and not retain</p> <p>8 records of the payments?</p> <p>9 A. I don't know the answer to that, sir. I</p> <p>10 think he testified about that in his deposition.</p> <p>11 But I don't recall exactly what he said.</p> <p>12 Q. During that time period, did United Inn</p> <p>13 monitor online reviews about the hotel?</p> <p>14 A. I think he was asked about that as well.</p> <p>15 I don't think they did. I don't have a specific</p> <p>16 recollection of it.</p> <p>17 Q. During that time period, did United Inn</p> <p>18 monitor websites advertising sex for money?</p> <p>19 A. I don't think so.</p> <p>20 Q. During that time period, did United Inn</p> <p>21 hold regular crime prevention meetings?</p> <p>22 MR. ALLUSHI: Objection. Go ahead, Karim.</p> <p>23 A. I'm going to say no. That's not something</p> <p>24 that I'm aware of being a practice in the hotel-type</p> <p>25 facilities. That's something that's a practice</p>

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<p>1 that's typically held in, you know, big corporate</p> <p>2 type, you know, one of the gas companies, for</p> <p>3 example, or apartments do it sometimes. But I'm not</p> <p>4 aware of that being a practice in hotels.</p> <p>5 BY MR. BOUCHARD:</p> <p>6 Q. Mr. Vellani, let's look at page 8 of</p> <p>7 Plaintiffs' Exhibit 1, which I can represent to you</p> <p>8 is identical to page 8 in Plaintiffs' Exhibits 2 and</p> <p>9 3 as well. On page 8 of Plaintiffs' Exhibit 1,</p> <p>10 there's a paragraph in the middle of the page that</p> <p>11 starts, "The exploitation phase."</p> <p>12 Do you see that?</p> <p>13 A. Yes, sir.</p> <p>14 Q. What do you mean by exploitation phase?</p> <p>15 A. Well, you have to go back to the previous</p> <p>16 paragraph that starts on page 7. So it talks about</p> <p>17 trafficking being a process crime, not a singular</p> <p>18 offense. So that process phase starts with, you</p> <p>19 know, either the deception -- I'm sorry -- the first</p> <p>20 phase of the four distinct phases is deception,</p> <p>21 abduction or recruitment. You know, in this case I</p> <p>22 think we've got probably -- we don't have abduction.</p> <p>23 You know, I think I can either characterize these</p> <p>24 three incidents as either starting with deception or</p> <p>25 recruitment. A.G. and G.W. may be a little</p>	<p>1 locations. So I don't know if I answered your</p> <p>2 question, but I hope I did.</p> <p>3 Q. Well, help me out with that paragraph</p> <p>4 where you say the exploitation phase occurs in</p> <p>5 different types of places. Are you talking there</p> <p>6 generally about human trafficking or are you talking</p> <p>7 about sex trafficking?</p> <p>8 A. Human trafficking consists of two</p> <p>9 different forms of trafficking. It consist of labor</p> <p>10 trafficking and sex trafficking or sex trafficking.</p> <p>11 So because we're talking about sex trafficking here,</p> <p>12 we can talk specifically about how that occurs with</p> <p>13 respect to sex trafficking.</p> <p>14 So the exploitation phase usually involves</p> <p>15 the moving the victims around to different</p> <p>16 locations. In other words, you're not just</p> <p>17 hunkering down at one hotel and everything is</p> <p>18 occurring there. You're usually moving around to</p> <p>19 different places. You can also be moved in the</p> <p>20 strip clubs. You can be moved into the massage</p> <p>21 parlors, you can be moved into residential</p> <p>22 environments which I think I mentioned to you is the</p> <p>23 most common location is a personal residence. Not</p> <p>24 in a hotel.</p> <p>25 Q. Is this paragraph saying -- or is it your</p>
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<p>1 different on that one. I guess recruitment would be</p> <p>2 the right word.</p> <p>3 And then transportation. So I think</p> <p>4 they -- at least with A.G. and G.W., I believe they</p> <p>5 transported themselves to the hotel, if I recall</p> <p>6 correctly. And then you have that exploitation</p> <p>7 phase which is usually where the incident occurs.</p> <p>8 Where the actual, you know, the actual sexual part</p> <p>9 of the incident occurs. Keep in mind we're talking</p> <p>10 about human trafficking here. We're not necessarily</p> <p>11 talking about sex trafficking with these four</p> <p>12 phases. So the exploitation can also be labor</p> <p>13 trafficking.</p> <p>14 And then you have the fourth phase which</p> <p>15 is victim disposal.</p> <p>16 So what I'm talking about with respect to</p> <p>17 the exploitation phase, it can occur and often</p> <p>18 occurs in different locations. If you're</p> <p>19 trafficking for labor, sometimes it may be only in</p> <p>20 one location, like, you know, basically you got a</p> <p>21 domestic slave for lack of a better word. That may</p> <p>22 only happen in one location.</p> <p>23 With sex trafficking, it's typically a</p> <p>24 transient crime where it's moving around from place</p> <p>25 to place, hotel to hotel, you know, residential</p>	<p>1 opinion that the exploitation phase as it relates to</p> <p>2 sex trafficking specifically can occur in public</p> <p>3 places?</p> <p>4 A. Yes.</p> <p>5 Q. How so?</p> <p>6 A. Well, if you've got somebody that's forced</p> <p>7 into commercial sex acts and are told to, for</p> <p>8 example, walk the street to solicit customers, the</p> <p>9 trafficking -- the actual exploitation can occur in</p> <p>10 a back alley, for example. It can occur in a car on</p> <p>11 the side of the street. It can occur in a public</p> <p>12 park, for example. So there are numerous places</p> <p>13 where the exploitation can occur.</p> <p>14 Q. Can exploitation as it relates to sex</p> <p>15 trafficking exploitation occur in hotel common</p> <p>16 areas?</p> <p>17 A. Yes.</p> <p>18 Q. How so?</p> <p>19 A. Well, again, I think in J.G.'s case she</p> <p>20 mentioned having sex in a car in the parking lots.</p> <p>21 So that would be in the common area. The parking</p> <p>22 lot would be the common area.</p> <p>23 Q. And to make sure that we're speaking the</p> <p>24 same language here, when we talk about hotel common</p> <p>25 areas, we're talking about parking lots, hallways,</p>

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<p>1 stairwells, breezeways, sidewalks that are on the</p> <p>2 property. Do you agree with that?</p> <p>3 A. Yes, or in the bushes.</p> <p>4 Q. Any other ways you can think of that the</p> <p>5 exploitation phase as it relates to sex trafficking</p> <p>6 can occur in a hotel common area?</p> <p>7 A. Yes, rooftop pools, or rooftops, period.</p> <p>8 Accessible rooftops.</p> <p>9 Q. Do you consider online ads a public place?</p> <p>10 MS. RICHENS: Objection.</p> <p>11 A. I would consider them to be a public</p> <p>12 place. But I think the online ads are typically for</p> <p>13 advertising of the exploitation.</p> <p>14 BY MR. BOUCHARD:</p> <p>15 Q. The next paragraph, Mr. Vellani, on page 8</p> <p>16 talks about sex trafficking being a transient</p> <p>17 clandestine crime, which I think you mentioned a few</p> <p>18 moments ago. Do you see where I'm referring?</p> <p>19 A. Yes, sir.</p> <p>20 Q. And you say "unlike robbery which often</p> <p>21 occurs in the open with victims willing to report</p> <p>22 the crime, the clandestine nature of the</p> <p>23 exploitation phase of sex trafficking makes it</p> <p>24 difficult to protect and prevent." Do you see that?</p> <p>25 A. Yes, sir.</p>	<p>1 two other parked cars or between a parked car and</p> <p>2 another structural barrier and you would still, you</p> <p>3 know, have concealment. That way and because of</p> <p>4 that, it would be difficult to detect and prevent.</p> <p>5 We're not talking about necessarily acts that are</p> <p>6 lasting all night long. So it could be something</p> <p>7 that happens very quickly in a parking lot. But</p> <p>8 she's the only one that factually stated that there</p> <p>9 was something going on outside.</p> <p>10 BY MR. BOUCHARD:</p> <p>11 Q. Have you reviewed as part of your review</p> <p>12 of certain discovery materials text messages between</p> <p>13 A.G. or G.W. and their traffickers?</p> <p>14 A. You know, I'd have to go back and look at</p> <p>15 their exhibits. That all sounds familiar. Give me</p> <p>16 one second. If I'm not mistaken, that stuff was in</p> <p>17 their -- in the deposition exhibits. There's a lot</p> <p>18 of files here. So just give me one minute.</p> <p>19 Q. I can represent to you, Mr. Vellani, there</p> <p>20 were certain text messages used in A.G. and G.W.'s</p> <p>21 depositions. It wasn't the full scope of them. So</p> <p>22 are you familiar with the text messages that were</p> <p>23 used as exhibits in their depositions, but if there</p> <p>24 were --</p> <p>25 MR. ALLUSHI: Objection.</p>
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<p>1 Q. Is that your opinion about sex trafficking</p> <p>2 in general or is that your opinion about the sex</p> <p>3 trafficking allegations in these three cases?</p> <p>4 A. Well, probably both. Because I'm only</p> <p>5 aware of one of the -- I'm only aware of J.G. who</p> <p>6 claims that on United property she had sex in the</p> <p>7 common areas. My understanding of all the rest of</p> <p>8 the incidents they were inside the guest room where</p> <p>9 it would be difficult to understand what's happening</p> <p>10 inside the guestroom, you know, without installing</p> <p>11 cameras or something in a guest room which would be</p> <p>12 ludicrous, obviously.</p> <p>13 Q. So do you make a distinction between</p> <p>14 J.G.'s allegations and A.G. or G.W.'s allegations</p> <p>15 because of what you just noted, or do you still say</p> <p>16 in all three cases that sex trafficking is a</p> <p>17 transient and clandestine crime that is difficult to</p> <p>18 detect and prevent?</p> <p>19 MR. ALLUSHI: Objection.</p> <p>20 A. So I would still hold the same opinion on</p> <p>21 all three cases. All I'm pointing out factually is</p> <p>22 that J.G. stated she had sex in the parking lot.</p> <p>23 The problem with that is you still have -- you know,</p> <p>24 that would be a concealment opportunity, right?</p> <p>25 Because, I mean, you could have sex in a car between</p>	<p>1 BY MR. BOUCHARD:</p> <p>2 Q. -- you're not familiar with them?</p> <p>3 MR. ALLUSHI: I'm going to object. If you</p> <p>4 need to review the record before you answer</p> <p>5 that, you can do so, Karim.</p> <p>6 THE WITNESS: Yeah. Thank you.</p> <p>7 A. I'm looking at some of the text messages</p> <p>8 now. So, yes, I do see this. In a Number A.G. 9,</p> <p>9 for example.</p> <p>10 BY MR. BOUCHARD:</p> <p>11 Q. Are you familiar with text messages</p> <p>12 outside of those that were used as exhibits in A.G.</p> <p>13 and G.W.'s depositions?</p> <p>14 A. Unless they were part of my file, I don't</p> <p>15 have a specific recollection of others. There may</p> <p>16 have been but I don't know.</p> <p>17 Q. Is it your opinion, Mr. Vellani, that sex</p> <p>18 trafficking of minors in hotels is always difficult</p> <p>19 to detect and prevent?</p> <p>20 A. Always? No. I mean, I think what's</p> <p>21 difficult is to know what's going on inside a room.</p> <p>22 Q. Why is that difficult?</p> <p>23 A. Because the guest room is a private space.</p> <p>24 You know, you're ultimately, you know, renting the</p> <p>25 room with a certain expectation of privacy. So, you</p>

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<p>1 know, you don't have staff that just comes in and</p> <p>2 unlocks the door and walks in. You may have staff</p> <p>3 that comes in upon request or at the guest's</p> <p>4 request. But you very rarely will see the hotel</p> <p>5 just going and unlock a door except by police</p> <p>6 request.</p> <p>7 Q. Are you not familiar with routine</p> <p>8 housekeeping services whereby hotel staff would</p> <p>9 regularly come into and out of rooms for cleaning</p> <p>10 purposes?</p> <p>11 A. Yes, that's what I meant. That's either</p> <p>12 at staff request because the housekeepers want to</p> <p>13 get in and clean or somebody wants to do an</p> <p>14 inspection or in the case of United Inn they had a</p> <p>15 policy to inspect a room every seven days. Or at a</p> <p>16 guest request where they request housekeeping or</p> <p>17 maintenance or something like that. So I did</p> <p>18 mention that.</p> <p>19 Q. When you talk about that United Inn</p> <p>20 policy, are you familiar with the DeKalb County</p> <p>21 motel/hotel ordinance in effect in 2017?</p> <p>22 A. Yes.</p> <p>23 MR. ALLUSHI: Objection.</p> <p>24 MS. RICHENS: Yeah, objection.</p> <p>25 A. I am familiar with it, yeah, I've actually</p>	<p>1 well. You know, that might give you some impetus to</p> <p>2 go and knock on the door and find out what's going</p> <p>3 on. We're not there yet for facial recognition</p> <p>4 cameras for sure. But I think we'll get there at</p> <p>5 some point. That would be a circumstance where I</p> <p>6 think it might be easier to detect. Barring</p> <p>7 something -- some, you know, technological</p> <p>8 advancement and a reduction in the cost of such</p> <p>9 technology, you know, I think it's -- it's</p> <p>10 challenging. If you were to go stand outside and</p> <p>11 just monitor, you know, every room, you know, have</p> <p>12 visibility to every room and sat there and count the</p> <p>13 number of unique people entering in over the course</p> <p>14 of an hour, that might be an indicator. But barring</p> <p>15 something like that, I don't know from an</p> <p>16 operational practice perspective, what would work</p> <p>17 today. Like, I think I have an understanding what's</p> <p>18 going to work in the future. Less so what is going</p> <p>19 to happen -- you know, what would work today.</p> <p>20 Q. I'm going to show you what I'm marking as</p> <p>21 Plaintiffs' Exhibit 4. I'm going to do a screen</p> <p>22 share here, Mr. Vellani.</p> <p>23 (Thereupon, marked as Plaintiff</p> <p>24 Exhibit 4.)</p> <p>25</p>
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<p>1 got it pulled up. I think it required, like, you</p> <p>2 know, 120 days or something before they have to</p> <p>3 check out or they can't stay longer than 120 days,</p> <p>4 something to that effect. It's actually been a</p> <p>5 while since I reviewed this 14-page ordinance. So I</p> <p>6 don't remember all the requirements in it.</p> <p>7 BY MR. BOUCHARD:</p> <p>8 Q. You said that sex trafficking of minors is</p> <p>9 not always difficult to detect and prevent in a</p> <p>10 hotel if I understood you correctly. Can you</p> <p>11 explain to me when it would not be difficult to</p> <p>12 detect and prevent in your opinion?</p> <p>13 A. Well, I can probably give you an extreme</p> <p>14 example, you know, if, for example, there was kind</p> <p>15 of a ubiquitous site like Backpage that existed and</p> <p>16 you had the ads that specify specific hotels or</p> <p>17 hotel room numbers, and there was a practice of</p> <p>18 monitoring those sites. You know, one of the</p> <p>19 technologies we're looking at today is the use of</p> <p>20 facial recognition cameras to identify the number of</p> <p>21 unique people entering into a, you know, a hotel</p> <p>22 room. And then after a certain threshold is met</p> <p>23 that would send an alert that, hey, there have been</p> <p>24 three unique people entering this room over the</p> <p>25 course of an hour and that happened the last hour as</p>	<p>1 BY MR. BOUCHARD:</p> <p>2 Q. And Plaintiffs' Exhibit 4 is an email and</p> <p>3 an attachment to it. Do you see that Plaintiffs'</p> <p>4 Exhibit 4 is Bates-stamped NBI003097 which I can</p> <p>5 represent to you is a document produced by</p> <p>6 United Inn?</p> <p>7 A. Yes, sir.</p> <p>8 Q. It's an email from investigator T. Wade</p> <p>9 whose signature block identifies him as being with</p> <p>10 the Rockdale County Sheriff's Office?</p> <p>11 A. Yes, sir.</p> <p>12 Q. Do you see the subject line says "missing</p> <p>13 person"?</p> <p>14 A. Yes, sir.</p> <p>15 Q. And it says, "Ashar, was advised by her</p> <p>16 guardian that she was staying at United Inn located</p> <p>17 at 4649 Memorial Drive. Thank you for your help."</p> <p>18 Do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. Are you familiar with this email?</p> <p>21 A. Yes, sir.</p> <p>22 Q. And you see there's an attachment to it,</p> <p>23 that says bolo [J.G.]?</p> <p>24 A. Yes, sir.</p> <p>25 Q. You understand [J.G.] is Plaintiff J.G.?</p>

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<p>1 A. Yes, sir.</p> <p>2 Q. What's a bolo?</p> <p>3 A. Be on the lookout.</p> <p>4 Q. Are you familiar with be on the lookout</p> <p>5 notices?</p> <p>6 A. Yes, sir.</p> <p>7 Q. Okay. And this is the attachment to, and</p> <p>8 you can see, it's the next consecutive Bates number</p> <p>9 of 003098 in that email. Have you seen this</p> <p>10 document before? That is the bolo missing person</p> <p>11 report for [J.G.]?</p> <p>12 A. Yes, sir.</p> <p>13 Q. Do you understand that the hotel received</p> <p>14 this email and the corresponding notice?</p> <p>15 A. Yes.</p> <p>16 Q. And do you understand that the email that</p> <p>17 we were just looking at was dated October 29th? Do</p> <p>18 you agree? I can go back to it.</p> <p>19 A. Yes, sir.</p> <p>20 Q. And the notice here is dated October 9th.</p> <p>21 It says that she's been missing since October 9th.</p> <p>22 Do you see that?</p> <p>23 A. I think I saw it on the other page.</p> <p>24 Q. Yes, sir.</p> <p>25 A. Yes.</p>	<p>1 front desk. Same thing with DNRs, do not rent list,</p> <p>2 trespass list, all these kind of things would be</p> <p>3 typically posted in the office, typically in the</p> <p>4 private area. You know, not in the common area.</p> <p>5 So, no, I'm not aware of anywhere they would see</p> <p>6 this without going into the office.</p> <p>7 Q. Do you know if each of the members of the</p> <p>8 housekeeping staff saw a copy of this notice?</p> <p>9 A. I can't say specifically with respect to</p> <p>10 this notice, sir.</p> <p>11 Q. Anything else that you think in your</p> <p>12 opinion the hotel should have done in response to</p> <p>13 receipt of this notice?</p> <p>14 A. Well, again, everybody's got different</p> <p>15 ways of communicating, right? I mean, every</p> <p>16 organization communicates in different ways. So in</p> <p>17 this situation, the way he -- the way Mr. Shareef</p> <p>18 shared information was by posting it in the office.</p> <p>19 I mean, I've seen other organizations which would be</p> <p>20 an email blast if everybody had email or a text</p> <p>21 blast or a Slack chat or something like that. So,</p> <p>22 you know, as long as they're communicating it</p> <p>23 somehow, I'm comfortable with that. The mechanism</p> <p>24 by which they communicate would be up to the</p> <p>25 individual culture or the organization that we're</p>
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<p>1 Q. In your opinion as somebody who works in</p> <p>2 the security industry and has provided</p> <p>3 recommendations to hotels about mitigating the risk</p> <p>4 of sex trafficking, what do you think United Inn and</p> <p>5 Suites should have done in response to receiving</p> <p>6 this notice?</p> <p>7 MS. RICHENS: Objection.</p> <p>8 A. Well --</p> <p>9 MR. ALLUSHI: Objection.</p> <p>10 A. -- somehow shared it with the staff. And</p> <p>11 my understanding from either the deposition or my</p> <p>12 interview with Mr. Shareef is they posted these</p> <p>13 missing persons flyers in the office so the staff</p> <p>14 could see them.</p> <p>15 BY MR. BOUCHARD:</p> <p>16 Q. Do you know if the staff had an</p> <p>17 opportunity to see this notice outside of walking</p> <p>18 into the office?</p> <p>19 A. I don't know where else they could post</p> <p>20 it. You know, it would have to go in the office. I</p> <p>21 mean, that whole kind of, you know, trespassing</p> <p>22 list, do not rent list, missing person list, all of</p> <p>23 that, you know, bad check list, you know, thinking</p> <p>24 about the way a bodega is run in New York City.</p> <p>25 They have the list of bad check writers right at the</p>	<p>1 dealing with.</p> <p>2 Q. When a hotel receives a notice like this</p> <p>3 that specifically says there's a missing 16-year-old</p> <p>4 who is suspected of being at that particular hotel,</p> <p>5 would you recommend to the hotel that they convene a</p> <p>6 staff meeting to ask staff whether they had seen the</p> <p>7 missing minor identified in the missing minor</p> <p>8 notice?</p> <p>9 MS. RICHENS: Objection.</p> <p>10 A. It's a lovely idea. But I don't know</p> <p>11 that -- you know, I don't know the frequency at</p> <p>12 which they deal with this kind of issue. You know,</p> <p>13 if it was a unique one-off circumstance, you know,</p> <p>14 perhaps. If this was, like, an ongoing thing where</p> <p>15 the police were leaving missing persons flyers, you</p> <p>16 know, I can't imagine that you would have a meeting</p> <p>17 every time something like this happened.</p> <p>18 So I think it was reasonable to post this</p> <p>19 in the office for the staff to be able to see it.</p> <p>20 You know, I also wouldn't recommend that somebody go</p> <p>21 door to door looking for her. So, again, I'm</p> <p>22 comfortable with what they did which is to post it</p> <p>23 in the office.</p> <p>24 Let me know when we get to a two-minute</p> <p>25 stopping point. I apologize. I didn't take a</p>

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<p>1 restroom break.</p> <p>2 BY MR. BOUCHARD:</p> <p>3 Q. Let me just ask a couple more questions.</p> <p>4 I won't take long.</p> <p>5 A. Sure.</p> <p>6 Q. Is a hotel's receipt of missing minor</p> <p>7 notices like this relevant to your assessment of the</p> <p>8 risk of sex trafficking at a hotel?</p> <p>9 MR. ALLUSHI: Objection.</p> <p>10 MS. RICHENS: Objection.</p> <p>11 A. Well, it's a missing -- I mean, based on</p> <p>12 what I'm looking at up on the screen, it's a missing</p> <p>13 person. It's not a notice of sex trafficking.</p> <p>14 Now, I think if you go back to the email</p> <p>15 for one second, I think he did reference that, if</p> <p>16 I'm not mistaken.</p> <p>17 Okay, so that even references it there. I</p> <p>18 mean, you know, no, it wouldn't -- I don't see the</p> <p>19 connection from a missing person to -- unless I'm</p> <p>20 not seeing something on the screen. I'm not seeing</p> <p>21 the connection to sex trafficking. I'm simply</p> <p>22 seeing a missing person flyer.</p> <p>23 BY MR. BOUCHARD:</p> <p>24 Q. So an unaccompanied missing 16-year-old</p> <p>25 law enforcement notice regarding an unaccompanied</p>	<p>1 monitor is 11:58 a.m. And we are off the</p> <p>2 record.</p> <p>3 (Lunch recess 11:58 a.m. until 12:48 p.m.)</p> <p>4 THE VIDEOGRAPHER: The time on the monitor</p> <p>5 is 12:48 p.m. and we are back on the record.</p> <p>6 BY MR. BOUCHARD:</p> <p>7 Q. Good afternoon, Mr. Vellani. Did you have</p> <p>8 a good lunch?</p> <p>9 A. Yes. Thank you.</p> <p>10 Q. Thank you. We were -- before we took the</p> <p>11 break, we were talking about Plaintiffs' Exhibit 4</p> <p>12 which was a notice regarding Plaintiff J.G. Do you</p> <p>13 remember Plaintiffs' Exhibit 4?</p> <p>14 A. Yes, sir.</p> <p>15 Q. And I wanted to ask you, sir, whether in</p> <p>16 your opinion is the number of missing minor notices</p> <p>17 that a hotel receives about minors suspected of</p> <p>18 being at the hotel relevant to the risk of sex</p> <p>19 trafficking at the hotel?</p> <p>20 MS. RICHENS: Objection.</p> <p>21 A. The answer is no, because I'm not certain</p> <p>22 of what the correlation is between missing persons</p> <p>23 and sex trafficking. A lot of missing persons are</p> <p>24 simply just runaways.</p> <p>25</p>
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<p>1 minor being at the hotel for weeks, is not relevant</p> <p>2 in your opinion to a hotel's assessment of the risk</p> <p>3 of sex trafficking at the hotel?</p> <p>4 MS. RICHENS: Objection.</p> <p>5 A. Again, I'm not -- I'm not -- perhaps I'm</p> <p>6 not following your question. But I'm not seeing the</p> <p>7 connection between a missing person and sex</p> <p>8 trafficking.</p> <p>9 BY MR. BOUCHARD:</p> <p>10 Q. Well, I'm not talking specifically about</p> <p>11 just a missing person report. I'm talking about a</p> <p>12 missing 16-year-old report that specifically regards</p> <p>13 that 16-year-old being at the property for weeks on</p> <p>14 end when it's the middle of the school year.</p> <p>15 MS. RICHENS: Objection.</p> <p>16 A. I --</p> <p>17 MR. ALLUSHI: Objection.</p> <p>18 A. I would look at that as a concern for a</p> <p>19 missing person. I wouldn't correlate that with sex</p> <p>20 trafficking.</p> <p>21 MR. BOUCHARD: Okay. This is a good time</p> <p>22 for us to take a break if it's a quick one. Or</p> <p>23 if we need a long one. We can go off the</p> <p>24 record here.</p> <p>25 THE VIDEOGRAPHER: Okay. The time on the</p>	<p>1 BY MR. BOUCHARD:</p> <p>2 Q. And, sir, are you not aware of a</p> <p>3 correlation between runaway minors and sex</p> <p>4 trafficking?</p> <p>5 A. Well, if you look at the number of -- if</p> <p>6 you look at the FBI's Uniform Crime Report which</p> <p>7 documents runaways, you're talking about, you know,</p> <p>8 tens if not hundreds of thousands of incidents on an</p> <p>9 annual basis. And you look at the number of sex</p> <p>10 trafficking incidents and you're talking about, you</p> <p>11 know, hundreds of incidents. So I'm not sure where</p> <p>12 that correlation would be.</p> <p>13 Q. Is your testimony that the prevalence of</p> <p>14 sex trafficking nationwide is hundreds of incidents</p> <p>15 per year?</p> <p>16 A. So --</p> <p>17 MR. ALLUSHI: Objection.</p> <p>18 A. -- I'm talking about the number of sex</p> <p>19 trafficking incidents -- I think we'll have to</p> <p>20 acknowledge the obvious, which is nobody's got great</p> <p>21 number on this issue. You know, we don't have --</p> <p>22 nobody collects statistics that have been found to</p> <p>23 be reliable. I think the FBI data is probably</p> <p>24 underreported and the national trafficking hotline</p> <p>25 is probably overreported. I don't think we've got a</p>

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<p>1 great handle on this. Having said that, you know,</p> <p>2 the prevalence data is just not any kind of a --</p> <p>3 it's not in a reliable place right now. But if you</p> <p>4 look at the FBI stats -- forgive me, I'm trying to</p> <p>5 pull it up. And I'm happy to share this with you</p> <p>6 since I did not provide this previously. I'm only</p> <p>7 looking this up in response to the question you're</p> <p>8 asking me.</p> <p>9 BY MR. BOUCHARD:</p> <p>10 Q. Sir, Mr. Vellani, I'm going to ask you,</p> <p>11 don't conduct internet searches --</p> <p>12 A. I'm not.</p> <p>13 Q. -- to try to answer --</p> <p>14 A. I'm not.</p> <p>15 Q. -- my question.</p> <p>16 A. I'm not. I'm looking at the FBI files</p> <p>17 that I actually have on my computer. And like I</p> <p>18 said, this was a file that I'm happy to provide you.</p> <p>19 You know, I did give you the DeKalb County incident.</p> <p>20 But if you look at 2022, for example, you know, they</p> <p>21 were not -- there's barely -- I don't have a total</p> <p>22 here, but there's barely a thousand incidents versus</p> <p>23 the tens of thousands or hundreds of thousands of</p> <p>24 calls the National Trafficking Hotline receives.</p> <p>25 The number is 2135, by the way, nationwide, in 2022.</p>	<p>1 United Inn and Suites is a healthcare setting, is</p> <p>2 that correct?</p> <p>3 A. No, sir. The purpose of this section was</p> <p>4 to illustrate the challenges in identifying victims</p> <p>5 in an environment where you're able to ask a lot of</p> <p>6 invasive questions and conduct physical examinations</p> <p>7 and also separate the victim from the trafficker.</p> <p>8 That was the purpose of this section. These are not</p> <p>9 things that a hotel can reasonably do.</p> <p>10 Q. Your first paragraph cites to four</p> <p>11 different footnotes, 10, 11, 12, 13, looking at</p> <p>12 page 9 of your first paragraph?</p> <p>13 A. Yes, sir.</p> <p>14 Q. Do you agree that those four footnotes</p> <p>15 pertain to sex trafficking identification in the</p> <p>16 healthcare setting?</p> <p>17 A. Yes, sir. Well, yes. 11 and 12 I know</p> <p>18 specifically address hotels as well and the</p> <p>19 challenges of identifying victims in other</p> <p>20 environments other than healthcare.</p> <p>21 Q. So your opinion in that first paragraph as</p> <p>22 I am going to read it is, "Without self-reporting,</p> <p>23 sex trafficking victims are difficult to identify</p> <p>24 and are frequently misidentified."</p> <p>25 Do you see that?</p>
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<p>1 You know, that's not a lot of data. If you go back</p> <p>2 to 2019, you know, we can look at those numbers and</p> <p>3 I can assure you I'm not doing it right now, but I</p> <p>4 can assure you it's going to be far less.</p> <p>5 Q. And my specific question was whether you</p> <p>6 were aware of the relationship between runaway</p> <p>7 minors and sex trafficking risks.</p> <p>8 Are you aware of the relationship or not</p> <p>9 aware?</p> <p>10 A. I'm aware of a relationship between</p> <p>11 vulnerable populations of which runaways would be</p> <p>12 part of that vulnerable population. So -- but as</p> <p>13 far as a direct correlation between missing minors</p> <p>14 and sex trafficking, no, I'm not aware of the</p> <p>15 correlation.</p> <p>16 Q. If we can take a look at page 9 of</p> <p>17 Plaintiffs' Exhibit 1. It's the J.G. report.</p> <p>18 Page 9 is identical in Exhibits 2 and 3 as well.</p> <p>19 Let me know when you're there, sir.</p> <p>20 A. Yes, sir. I'm there.</p> <p>21 Q. Do you agree, sir, that pages 9 through 11</p> <p>22 of your report concern identifying sex trafficking</p> <p>23 victims in the healthcare setting?</p> <p>24 A. Yes, sir.</p> <p>25 Q. And you're not of the opinion that the</p>	<p>1 A. Yes, sir.</p> <p>2 Q. Focusing on the hospitality setting in the</p> <p>3 hospitality environment. Is it your opinion that</p> <p>4 unless minor victims of sex trafficking self-report,</p> <p>5 they are difficult to identify in a hospitality</p> <p>6 setting?</p> <p>7 A. Yes.</p> <p>8 Q. What is your basis for that opinion?</p> <p>9 A. So, again, it's easier to think about</p> <p>10 this -- I hope it's easier to think about this if</p> <p>11 you look at the challenges in environments where</p> <p>12 it's easier to identify them. Challenging but still</p> <p>13 easier, okay? So we have difficulties in</p> <p>14 identifying victims in environments where</p> <p>15 theoretically it's easier to identify them. So</p> <p>16 anything short of those environments makes it</p> <p>17 significantly harder. So that's kind of the basis</p> <p>18 for it. The other thing is when I think about how</p> <p>19 to solve this problem, and that's what I do, I mean,</p> <p>20 that's what I do for a living is try to solve crime</p> <p>21 problems. I look at all the various solutions to</p> <p>22 try and solve a crime problem and there's very few</p> <p>23 things that are in existence today, either</p> <p>24 technology-wise or, you know, are reasonable to</p> <p>25 deploy that could be, you know, used to, you know,</p>

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<p>1 determine whether something bad is going on, right?</p> <p>2 I mean, all you can do is provide all the things</p> <p>3 that you can provide, like phones, for example, in</p> <p>4 rooms or making staff available so people can</p> <p>5 self-report. I don't know if I answered your</p> <p>6 question. I hope I did.</p> <p>7 Q. Do you think that the act of sex</p> <p>8 trafficking minors is as likely to happen in a</p> <p>9 healthcare environment as it is in a hospitality</p> <p>10 environment?</p> <p>11 A. Okay. So we have to go back to the</p> <p>12 process notion, right? It's not -- sex trafficking</p> <p>13 is not an act, okay? The sex, the exploitation, the</p> <p>14 sex is an act but there's a whole process involved</p> <p>15 with this. So do I think that the exploitation, the</p> <p>16 abduction, as the case may be in some instances, not</p> <p>17 our instances, but in other instances that can occur</p> <p>18 elsewhere besides at a hotel.</p> <p>19 Q. And I appreciate the clarification and</p> <p>20 understand the point. Let me clarify my question</p> <p>21 and say, do you agree that it's more likely that the</p> <p>22 exploitation phase of sex trafficking will occur in</p> <p>23 a hospitality environment than in a healthcare</p> <p>24 environment?</p> <p>25 A. Not the exploitation. If you go within</p>	<p>1 Q. Is it your opinion that signage can</p> <p>2 encourage victims of sex trafficking to report their</p> <p>3 victimization, whether it's verbal reporting or</p> <p>4 nonverbal reporting?</p> <p>5 MR. ALLUSHI: Objection.</p> <p>6 A. So the signage here is basically very</p> <p>7 explicit instructions on how to report that you need</p> <p>8 help. So, for example, it's not just a sign like</p> <p>9 the one that's, you know, in OGCA that requires just</p> <p>10 the National Trafficking Hotline. This is very</p> <p>11 explicit signage that says flip over this sign to</p> <p>12 let us know you need help. Or, you know, put this</p> <p>13 colored sticker on the urine cup so we know you're</p> <p>14 trying to tell us something. Right? It's very</p> <p>15 explicit signage. But it's also signage that comes</p> <p>16 on the heels of this very invasive questioning that</p> <p>17 medical providers can ask that hotel folks cannot</p> <p>18 ask or shouldn't ask. You know, so it's -- it's if</p> <p>19 they have -- what I'm laying out here is how we do</p> <p>20 it in healthcare. It is basically a start to finish</p> <p>21 process that involves all steps. Not just some.</p> <p>22 BY MR. BOUCHARD:</p> <p>23 Q. Understood. And I want to go back to the</p> <p>24 question and just understand. Do you believe that</p> <p>25 signage can encourage victims of sex trafficking to</p>
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<p>1 the umbrella of the exploitation, there are many</p> <p>2 acts involved. Okay. This is the reason why they</p> <p>3 have, for example, I don't know about other states,</p> <p>4 but here in Texas, if you go get a haircut, you're</p> <p>5 going to see the sex trafficking sign. Okay?</p> <p>6 Because the exploitation can occur at the barbershop</p> <p>7 as well. So exploitation is a broader concept than</p> <p>8 just a sex act. I do agree with you that the sex</p> <p>9 act is most likely to occur in a private space.</p> <p>10 Whether that's a personal residence, a car that's</p> <p>11 concealed, you know, a park where there's nobody at</p> <p>12 or in a guest room of a hotel.</p> <p>13 Q. As opposed to a healthcare environment?</p> <p>14 A. Yeah. God, I hope not, but, yeah, I</p> <p>15 guess.</p> <p>16 Q. I want to look at page 12. You say in the</p> <p>17 middle paragraph, you start by saying, "Healthcare</p> <p>18 facilities can also implement methods to encourage</p> <p>19 victims to give nonverbal signals."</p> <p>20 Are you familiar with this paragraph?</p> <p>21 A. Yes, sir.</p> <p>22 Q. And part of -- at least part of what you</p> <p>23 discuss in this paragraph, if you agree with me,</p> <p>24 sir, relates to signage. Do you agree with me?</p> <p>25 A. Yes, sir.</p>	<p>1 report their victimization?</p> <p>2 A. Okay. But -- yes, yes. But based on the</p> <p>3 way the sign is that I'm referring to here which is</p> <p>4 very explicit, right? A sign that says, you know,</p> <p>5 flip this sign over -- number one, you're creating</p> <p>6 this trustworthy, safe space followed by separation</p> <p>7 of the trafficking victim from the trafficker,</p> <p>8 followed by this very thorough medical examination</p> <p>9 followed by these invasive questions culminating in,</p> <p>10 hey, we need to get a urine sample. Go to this</p> <p>11 private bathroom which is only accessible to</p> <p>12 patients and then you'll find this very explicit</p> <p>13 sign with instructions on it. This is not the same</p> <p>14 thing as throwing up a sign in a hotel lobby.</p> <p>15 That's all I'm trying to illustrate.</p> <p>16 Q. Just underneath that paragraph still</p> <p>17 looking at page 12 of Plaintiffs' Exhibit 1, there's</p> <p>18 a paragraph that begins, "I am unaware of any</p> <p>19 evidence-based research."</p> <p>20 Do you see that?</p> <p>21 A. Yes, sir.</p> <p>22 Q. And you're familiar with that paragraph,</p> <p>23 sir?</p> <p>24 A. Yes, sir.</p> <p>25 Q. What is the definition, or what is your</p>

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<p>1 definition of evidence-based research?</p> <p>2 A. So glad you asked me that question. I</p> <p>3 just did a great presentation on this. I think it</p> <p>4 was a great presentation for the -- for the American</p> <p>5 Society for Industrial Security. And I would rather</p> <p>6 just read it to you if you don't mind, because I</p> <p>7 think this is an important part of this.</p> <p>8 Q. Well, sir, every witness --</p> <p>9 MR. ALLUSHI: Let him. Hang on, David,</p> <p>10 let him finish.</p> <p>11 MR. BOUCHARD: Well, he was starting to</p> <p>12 pull it up, I believe, and I was just going to</p> <p>13 ask him not to do that.</p> <p>14 A. Well, I explore the benefit of not having</p> <p>15 to try and memorize this. Basically evidence-based</p> <p>16 is an approach. It started in medicine. It has in</p> <p>17 essence expanded into law enforcement education and</p> <p>18 the security industry that emphasizes the practical</p> <p>19 application of findings based on the best available</p> <p>20 current research.</p> <p>21 So in the security industry we talk about</p> <p>22 a systematic approach to reviewing evidence,</p> <p>23 criminology evidence in our case, or</p> <p>24 security-related research in our case to identify</p> <p>25 those best practices that work. And ultimately what</p>	<p>1 control trials, right? We're looking for more than</p> <p>2 a bunch of yahoos sitting in a room making up</p> <p>3 indicators and saying, yeah, these are indicators of</p> <p>4 sex trafficking. Because that is not evidence</p> <p>5 based, and to your point, that's not peer-reviewed.</p> <p>6 Q. Okay. So did you just give me the full</p> <p>7 evidence hierarchy as you're calling it or is there</p> <p>8 more to that hierarchy?</p> <p>9 A. No, there's more to it. Do you want me to</p> <p>10 pull that up?</p> <p>11 Q. So just as a general rule I don't want you</p> <p>12 to be pulling up documents.</p> <p>13 A. Okay.</p> <p>14 Q. Referring to files or anything else unless</p> <p>15 I'm asking you or referring you to the document.</p> <p>16 Because if we were sitting here in person,</p> <p>17 Mr. Vellani, obviously, you wouldn't have the</p> <p>18 ability to do that. And it's not the typical or</p> <p>19 accepted practice in depositions for witnesses to</p> <p>20 just be referring to their own documents.</p> <p>21 So I'm asking as you're sitting here and</p> <p>22 as you recall, is there more to that evidence</p> <p>23 hierarchy that you can tell me about?</p> <p>24 A. Yes. As I recall, so like I said,</p> <p>25 systematic reviews are considered a level 5.</p>
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<p>1 we're trying to do is find out what works, what</p> <p>2 doesn't and what is -- (Zoom distortion).</p> <p>3 THE STENOGRAPHER: Your audio cut out</p> <p>4 there, sir. "What doesn't and what is..."</p> <p>5 A. What works, what doesn't and what is</p> <p>6 promising.</p> <p>7 THE STENOGRAPHER: Thank you.</p> <p>8 BY MR. BOUCHARD:</p> <p>9 Q. And so what needs to serve as the basis</p> <p>10 for the evidence-based research? Is it</p> <p>11 peer-reviewed studies? Is it randomized controlled</p> <p>12 trials what constitutes, quote/unquote, evidence?</p> <p>13 A. Sure, that's a great question. So there's</p> <p>14 something called the evidence hierarchy. And at the</p> <p>15 top of the evidence hierarchy are systematic</p> <p>16 reviews. A systematic review is basically a</p> <p>17 summary, a synthesis of all prior research that's</p> <p>18 been done on a certain topic. Typically, those</p> <p>19 prior studies are going to be randomized control</p> <p>20 trials. So where systematic reviews exist, that's</p> <p>21 what we're looking for. Systematic reviews are</p> <p>22 pretty rare in my field. They do exist in some</p> <p>23 areas like lighting and video surveillance, things</p> <p>24 like that.</p> <p>25 Barring that, we're looking for randomized</p>	<p>1 Randomized control trials are also considered a</p> <p>2 level 5. Other studies like pretest/post-test,</p> <p>3 meaning what's the crime before we implement</p> <p>4 measures? What's the crime after we implement</p> <p>5 measures? Those are typically, if I recall, like a</p> <p>6 level 3 or 4. Below that is survey research. Below</p> <p>7 that is, you know, like case studies, like corporate</p> <p>8 case studies and just opinions.</p> <p>9 Q. So would those be levels 1 and 2?</p> <p>10 A. I think, believe it or not, I actually</p> <p>11 think it starts at level 0. I think it goes from</p> <p>12 level 0 to 5.</p> <p>13 Q. Is it your opinion, Mr. Vellani, that</p> <p>14 anti-trafficking intervention should not be used at</p> <p>15 hotels unless there's evidence-based research</p> <p>16 showing they are effective?</p> <p>17 MR. ALLUSHI: Objection.</p> <p>18 A. I wouldn't say that. What I would say is</p> <p>19 that, you know, there are some organizations that</p> <p>20 will implement things that they have seen work at</p> <p>21 other locations. And they can try and see if it</p> <p>22 will work at, you know, a potential other location.</p> <p>23 In which case they've got anecdotal information,</p> <p>24 anecdotal evidence that something works. So it</p> <p>25 doesn't have to be only, you know, evidence-based</p>

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<p style="text-align: right;">Page 118</p> <p>1 research. We can still try things that work in one</p> <p>2 location and see if it works in another location.</p> <p>3 That's, obviously, not always the case but, you</p> <p>4 know, ideally it would work at another location.</p> <p>5 But there's no way to know until you try it.</p> <p>6 Q. I take it based on that answer that your</p> <p>7 answer here will be no, but let me know if I'm</p> <p>8 wrong. Is it your opinion that anti-trafficking</p> <p>9 interventions cannot be effective at hotels unless</p> <p>10 there's evidence-based research of their</p> <p>11 effectiveness?</p> <p>12 MR. ALLUSHI: Objection.</p> <p>13 A. Well, again, it's hard for me to answer on</p> <p>14 such a broad question, right? It depends on what</p> <p>15 you're talking about. I mean, what we've seen with</p> <p>16 respect to this -- there's no criminology studies</p> <p>17 that I'm aware of, for example, with respect to</p> <p>18 signage, right? Does the mere presence of a traffic</p> <p>19 hotline sign change any outcomes? I don't know that</p> <p>20 because we don't have research that supports that.</p> <p>21 So it depends on what measures you're talking about.</p> <p>22 What I'm saying with that paragraph in that report,</p> <p>23 in that section of the report, is that those red</p> <p>24 flags so to speak, that Polaris and Homeland</p> <p>25 Security put out, there is no evidence backing those</p>	<p style="text-align: right;">Page 120</p> <p>1 Q. Is it your opinion that only academics and</p> <p>2 researchers are qualified to implement</p> <p>3 anti-trafficking interventions?</p> <p>4 A. No. I mean, I don't consider myself a</p> <p>5 researcher. I just happen to be a security</p> <p>6 consultant who engages with the research. So I</p> <p>7 would say the answer to that is no.</p> <p>8 Q. What about operation of hotels? Are folks</p> <p>9 who are not academics or researchers qualified to</p> <p>10 operate hotels, in your opinion?</p> <p>11 A. Qualified to operate hotels? Sure.</p> <p>12 MR. ALLUSHI: Objection.</p> <p>13 A. I would say that's fairly common in the</p> <p>14 standard, the norm.</p> <p>15 BY MR. BOUCHARD:</p> <p>16 Q. Have you personally evaluated the</p> <p>17 effectiveness of anti-trafficking interventions in</p> <p>18 the hospitality industry?</p> <p>19 A. No. What I do is I engage with the</p> <p>20 research. So I'm not personally a researcher myself</p> <p>21 most of the time. I mean, I've done research in the</p> <p>22 past on my own on different topics, you know,</p> <p>23 security staffing in hospitals which you may have</p> <p>24 seen on my CV. But, no, I don't personally conduct</p> <p>25 the research. What I do is spend 20 percent of my</p>
<p style="text-align: right;">Page 119</p> <p>1 up. They just sound like good ideas. And I know</p> <p>2 there's a pending FOIA request out there to DHS on</p> <p>3 this and Polaris trying to get support, like, how</p> <p>4 did they come up with that list? I have not seen</p> <p>5 the results of that yet, by the way.</p> <p>6 BY MR. BOUCHARD:</p> <p>7 Q. Are you aware of evidence-based research</p> <p>8 showing, for example, that DHS indicia are</p> <p>9 unreliable?</p> <p>10 A. No, not unreliable.</p> <p>11 Q. Are you aware of evidence-based research</p> <p>12 showing that the Polaris indicia are unreliable?</p> <p>13 A. No, not unreliable. Because I think</p> <p>14 that's the problem, is nobody is testing this stuff</p> <p>15 right? There was a great article in Police Chief</p> <p>16 Magazine which is the International Association of</p> <p>17 Chiefs of Police Magazine that talks about some of</p> <p>18 what they thought was indicia on Backpage that turns</p> <p>19 out that it was no correlation with sex trafficking.</p> <p>20 So they, you know, get a bunch of yahoos sitting</p> <p>21 around a room, develop a bunch of red flags or</p> <p>22 indicators and then at some point they go out and</p> <p>23 test this stuff and see if it actually does</p> <p>24 correlate or doesn't correlate. At least in that</p> <p>25 one police chief article it did not correlate.</p>	<p style="text-align: right;">Page 121</p> <p>1 time reviewing research. Whether it's on</p> <p>2 trafficking or workplace violence or mass shooters</p> <p>3 or what have you.</p> <p>4 BY MR. BOUCHARD:</p> <p>5 Q. Have you talked to anybody at the</p> <p>6 Department of Homeland Security about the campaign</p> <p>7 signs and indicators?</p> <p>8 A. No. What I mentioned is that we've got a</p> <p>9 pending -- I've got a colleague that's got a pending</p> <p>10 request that I helped write. A FOIA request to</p> <p>11 identify if there was any evidence associated with</p> <p>12 those indicators. And I believe, if I'm not</p> <p>13 mistaken, I'm not directly involved, but I believe</p> <p>14 that FOIA request went to Polaris because they've</p> <p>15 got federal funding. So they would be subjected to</p> <p>16 FOIA. And one to DHS, obviously, which would have</p> <p>17 to respond to that request.</p> <p>18 Q. Do you consider DHS to be an expert on our</p> <p>19 nation's criminal laws?</p> <p>20 MR. ALLUSHI: Objection.</p> <p>21 A. I wouldn't know how to handle that. I</p> <p>22 mean, I would say that their primary objective is to</p> <p>23 protect the homeland from terrorism. Again, I think</p> <p>24 that's a better question for them, not me.</p> <p>25</p>

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<p>1 BY MR. BOUCHARD:</p> <p>2 Q. Do you believe there are sex trafficking</p> <p>3 experts working at the Department of Homeland</p> <p>4 Security?</p> <p>5 A. I don't know, sir.</p> <p>6 Q. Are you aware of whether the Department of</p> <p>7 Homeland Security trains the nation's federal law</p> <p>8 enforcement officers on sex trafficking using the</p> <p>9 Blue Campaign?</p> <p>10 A. That I understand might be a role, sir, of</p> <p>11 other police departments.</p> <p>12 Q. Is it your opinion that the Department of</p> <p>13 Homeland Security should not be training the</p> <p>14 nation's federal law enforcement officers on sex</p> <p>15 trafficking using the Blue Campaign?</p> <p>16 MR. ALLUSHI: Objection.</p> <p>17 A. Just to be clear, you're saying Blue</p> <p>18 Campaign. I didn't know the Blue Campaign applied</p> <p>19 to the training of law enforcement, whether it's</p> <p>20 federal, state, or local. So -- but taking the Blue</p> <p>21 Campaign part of it out, I do think it's appropriate</p> <p>22 for DHS to be training federal law enforcement as</p> <p>23 well as state and local.</p> <p>24 BY MR. BOUCHARD:</p> <p>25 Q. So what's the distinction you're making</p>	<p>1 Q. Have you ever given talks or presentations</p> <p>2 to a hospitality organization or association about</p> <p>3 use of sex trafficking red flags and indicators?</p> <p>4 A. No.</p> <p>5 Q. Are there any sex trafficking red flags or</p> <p>6 indicators that you believe are reliable?</p> <p>7 A. Yes. I think there's a lot of evidence.</p> <p>8 If you look at pages 10, 11, 12 of my reports, there</p> <p>9 is a lot of -- I won't say a lot. There is</p> <p>10 evidence-based support for some of those questions.</p> <p>11 There are also various screening tools out there</p> <p>12 that could be used to, you know, question potential</p> <p>13 victims to identify whether they're, you know, in</p> <p>14 fact, a victim or not. So there are a number of</p> <p>15 tools out there. It was like there was a recent</p> <p>16 systematic review which looked at 41 different</p> <p>17 screening tools. Each of those screening tools had</p> <p>18 evidence-based indicators within them. That's one</p> <p>19 of the articles I gave you that are cited, that I</p> <p>20 sent you.</p> <p>21 Q. Let me focus that question on the</p> <p>22 hospitality industry specifically. Are there any</p> <p>23 sex trafficking red flags or indicators that you</p> <p>24 believe are reliable specifically for the</p> <p>25 hospitality setting?</p>
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<p>1 between the Blue Campaign and DHS training federal,</p> <p>2 state and local law enforcement on sex trafficking?</p> <p>3 A. I don't know that the Blue Campaign is</p> <p>4 all-encompassing the way you're proposing it is. I</p> <p>5 understood the Blue Campaign to be primarily focused</p> <p>6 on the business sector. Not necessarily, I mean,</p> <p>7 they may refer to it as Blue Campaign, I guess, in</p> <p>8 the training. But I've never heard it referred to</p> <p>9 that way.</p> <p>10 Q. Have you talked to anyone in the American</p> <p>11 Hospitality and Lodging Association about the</p> <p>12 effectiveness of sex trafficking signs and</p> <p>13 indicators?</p> <p>14 A. No.</p> <p>15 Q. Anybody at any other hospitality and</p> <p>16 lodging associations that you've spoken to about</p> <p>17 that topic?</p> <p>18 A. No, because what I -- I wouldn't ask them</p> <p>19 about the findings. What I would be asking them for</p> <p>20 would be the underlying support for anything that</p> <p>21 they told me. So I would still be looking for that,</p> <p>22 you know, internal association case study or I would</p> <p>23 be looking for the published peer-reviewed journal</p> <p>24 articles which looked at that issue. And I looked</p> <p>25 for those and they don't exist.</p>	<p>1 A. There are none that are evidence-based.</p> <p>2 There are some that just make practical sense to me,</p> <p>3 like not renting by the hour, right? Hourly rentals</p> <p>4 to me don't make a lot of sense unless you're on a</p> <p>5 major thoroughfare and you're catering specifically</p> <p>6 to truckers, for example, who need to shower and get</p> <p>7 back on the road. But even then, you've got truck</p> <p>8 stops that handle that kind of traffic. So the</p> <p>9 short answer is no, I'm not aware of any, you know,</p> <p>10 that are reliable in the sense that they're</p> <p>11 evidence-based.</p> <p>12 Q. You said you do believe there are some</p> <p>13 that made common sense or at least that's what I</p> <p>14 understood you to say?</p> <p>15 A. I said the hourly rentals doesn't make a</p> <p>16 lot of sense to me. I mean, I don't see where</p> <p>17 there's a market need for that except in the case</p> <p>18 where there's no truck stops and you're on a major</p> <p>19 thoroughfare and you're catering to truckers, you</p> <p>20 know, long-haul drivers.</p> <p>21 Q. Any other red flags or indicators that you</p> <p>22 think make sense for the hospitality industry other</p> <p>23 than hourly rentals?</p> <p>24 A. No, because as I've gone through the</p> <p>25 various lists of indicators that have kind of</p>

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<p>1 changed a little bit over time and are a little bit</p> <p>2 different between the organization that you're</p> <p>3 looking at. None of them -- all of them have -- all</p> <p>4 of them have reasons why you may do something that</p> <p>5 would otherwise be an indicator. Like, for example,</p> <p>6 accepting cash, right? I mean, that is one of the</p> <p>7 purported indicators, but there are plenty of</p> <p>8 reasons why people would use cash. You know, so</p> <p>9 that in and of itself to me is not any kind of</p> <p>10 indicator. There is certainly no research to</p> <p>11 support the notion that only criminals use cash or</p> <p>12 only sex traffickers use cash. I occasionally use</p> <p>13 it for some reason.</p> <p>14 Q. I'm going to show you what I'm marking at</p> <p>15 Plaintiffs' Exhibit 5.</p> <p>16 (Thereupon, marked as Plaintiff</p> <p>17 Exhibit 5.)</p> <p>18 BY MR. BOUCHARD:</p> <p>19 Q. And I just direct you to Plaintiff's</p> <p>20 Exhibit 1. You can look at page 12 where you cite</p> <p>21 to the Polaris project --</p> <p>22 A. Yes.</p> <p>23 Q. -- that suggests certain questions to ask</p> <p>24 sex trafficking victims. So I'm going to show you</p> <p>25 Plaintiffs' Exhibit 5 here.</p>	<p>1 Q. Okay. Is this the source for what you</p> <p>2 have on the bottom of page 12 and 13 of your expert</p> <p>3 reports?</p> <p>4 A. It appears to be, yes, sir.</p> <p>5 Q. And you see the copyright on this document</p> <p>6 is 2011?</p> <p>7 A. Yes, sir.</p> <p>8 Q. Is your understanding that these were</p> <p>9 questions that were for hospitality participants to</p> <p>10 ask or law enforcement and other professionals to</p> <p>11 ask?</p> <p>12 A. Well, it certainly wasn't hospitality. I</p> <p>13 actually could never figure out who the audience was</p> <p>14 for this. But it wasn't hospitality. I can almost</p> <p>15 assure you that. These would be crazy questions to</p> <p>16 ask a guest.</p> <p>17 Q. You do see here that it says, for example,</p> <p>18 on page 1 of Plaintiffs' Exhibit 5 under assessment</p> <p>19 environment and tone, "Conduct the assessment in a</p> <p>20 comfortable, safe environment. If you are in a</p> <p>21 police station or in a place where the physical</p> <p>22 space/conditions are limiting, attempt to create an</p> <p>23 environment that is as calming and positive as</p> <p>24 possible."</p> <p>25 Do you see that?</p>
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<p>1 (Clarification requested by stenographer.)</p> <p>2 BY MR. BOUCHARD:</p> <p>3 Q. Do you see that I've put Plaintiffs'</p> <p>4 Exhibit 5 in front of you, Mr. Vellani, which is the</p> <p>5 National Human Traffic Resource Center/Polaris</p> <p>6 Project Comprehensive Human Trafficking Assessment?</p> <p>7 A. Yes, sir.</p> <p>8 Q. And I'll represent to you that when I was</p> <p>9 looking at the bottom of page 12 of Plaintiffs'</p> <p>10 Exhibit 1, where you have the list of questions, I</p> <p>11 didn't know exactly where they came from. And I did</p> <p>12 some research and it appears they came from this</p> <p>13 assessment. Is this the source of the questions</p> <p>14 that appear on pages 12 to 13 of your expert</p> <p>15 reports?</p> <p>16 A. I don't know. You'd have to go to page 4</p> <p>17 so I can see that. I don't know if it's the same</p> <p>18 version or not. Well, that's general trafficking.</p> <p>19 Can you go down to the one that says sex trafficking</p> <p>20 questions? I apologize, I don't see numbers on this</p> <p>21 document. But I saw a table of contents with</p> <p>22 numbers unless I was mistaken.</p> <p>23 Q. I think it's --</p> <p>24 A. There you go. Yes. Thank you. Those are</p> <p>25 the questions.</p>	<p>1 A. Yes, that's kind of what I was looking to.</p> <p>2 We do the same thing in hospitals.</p> <p>3 Q. And just to clarify, are you saying that</p> <p>4 the questions that are on pages 10 and 11, you</p> <p>5 agree -- of your report, Plaintiffs' Exhibit 1, do</p> <p>6 you agree that the questions on pages 10 and 11 are</p> <p>7 not questions that you would expect somebody in the</p> <p>8 hospitality industry to ask?</p> <p>9 A. Yes, that's correct. The section was not</p> <p>10 on hospitality specifically. It was about how to</p> <p>11 identify a victim. What are the different methods</p> <p>12 for identifying a victim.</p> <p>13 Q. I want you to look, if you can, sir, back</p> <p>14 at Plaintiffs' Exhibit 1 page 13, please.</p> <p>15 A. Okay.</p> <p>16 Q. Your last sentence on that page starts</p> <p>17 "Unlike healthcare environments." Do you see that?</p> <p>18 A. Yes, sir.</p> <p>19 Q. When you say hotels like the United Inn</p> <p>20 and Suites are not well situated to identify victims</p> <p>21 of sex trafficking, what do you mean by the term</p> <p>22 "well situated"?</p> <p>23 A. Well, again, if you think about what is</p> <p>24 necessary, okay, and even in -- let me be clear</p> <p>25 about this, because even when you do the things that</p>

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<p align="right">Page 130</p> <p>1 I'm about to list, you can still get it wrong.</p> <p>2 Okay. You can still make mistakes. So what I</p> <p>3 recommend and I think ultimately what even Polaris</p> <p>4 is recommending in that is that you go through these</p> <p>5 invasive screening tools, right? You ask a lot of</p> <p>6 invasive questions. So in the healthcare</p> <p>7 environment you go further than that. You also</p> <p>8 conduct a physical examination. You also do a</p> <p>9 medical records review. And then you create that</p> <p>10 safe environment which Polaris talks about, right?</p> <p>11 And then at least in the environments that I'm</p> <p>12 talking about, you would give them that further step</p> <p>13 of creating, you know, the signage that with</p> <p>14 exclusive directions on how we want you to</p> <p>15 communicate to us nonverbally that you're a</p> <p>16 trafficking victim.</p> <p>17 So, no, these are not things that a hotel</p> <p>18 can do. But these are not necessarily only things</p> <p>19 that law enforcement can do. The point of it is</p> <p>20 that it is very difficult to identify a victim even</p> <p>21 in environments where you can do a medical records</p> <p>22 review, a physical examination, ask a lot of</p> <p>23 invasive questions. Separate the trafficker from</p> <p>24 victim. These are not things a hotel can do. So</p> <p>25 They're not well situated to actually do much in</p>	<p align="right">Page 132</p> <p>1 situated to identify victims of sex trafficking</p> <p>2 versus saying hotels are not well situated to</p> <p>3 identify red flags and indicators promulgated by the</p> <p>4 Department of Homeland Security or Polaris or ECPAT</p> <p>5 or BEST or any of the other organizations that</p> <p>6 promulgate sex trafficking red flags and indicators?</p> <p>7 MR. ALLUSHI: Objection.</p> <p>8 A. We're kind of at a crossroads. You either</p> <p>9 got to pull up the red flags for me or I'm happy to</p> <p>10 do it on my end. We can do it either way. I need</p> <p>11 to look at those indicators so I can answer your</p> <p>12 question properly.</p> <p>13 BY MR. BOUCHARD:</p> <p>14 Q. Okay. Well, take away the words "red</p> <p>15 flags," because we've been talking about indicators</p> <p>16 of sex trafficking already. So do you agree there's</p> <p>17 a difference between identifying a victim of</p> <p>18 trafficking and identifying indicators of</p> <p>19 trafficking?</p> <p>20 MR. ALLUSHI: Objection.</p> <p>21 A. We're still in the same place though.</p> <p>22 Because, you know, again, the indicators that I talk</p> <p>23 about and the indicators that I recommend to my</p> <p>24 clients to look out for are not the same as what</p> <p>25 Polaris and Blue Campaign look at. I would just</p>
<p align="right">Page 131</p> <p>1 terms of identifying an actual victim of</p> <p>2 trafficking.</p> <p>3 Q. Do you agree with me that a victim of</p> <p>4 trafficking can be identified through observable</p> <p>5 behaviors, not just through questions that you pose</p> <p>6 to the victim?</p> <p>7 A. No.</p> <p>8 Q. Do you agree that identifying victims of</p> <p>9 sex trafficking is different than identifying red</p> <p>10 flags of sex trafficking?</p> <p>11 MR. ALLUSHI: Objection.</p> <p>12 A. Well, define what you mean by red flags.</p> <p>13 Because there's behavioral red flags that are</p> <p>14 associated with, you know, an environment, I think</p> <p>15 the way they are presented by DHS or Polaris. And</p> <p>16 there's also acts that people do, right, that are</p> <p>17 specific. So I guess I need your help in</p> <p>18 understanding what you mean by red flags, because,</p> <p>19 obviously, that's not a -- you know, that's not a</p> <p>20 normal word, right? That's implying something.</p> <p>21 BY MR. BOUCHARD:</p> <p>22 Q. Well, when you say they're not well</p> <p>23 situated to identify victims of sex trafficking,</p> <p>24 what I'm trying to understand is, is there a</p> <p>25 difference between saying hotels are not well</p>	<p align="right">Page 133</p> <p>1 like to be just a little bit more specific so I can</p> <p>2 give you a proper answer.</p> <p>3 BY MR. BOUCHARD:</p> <p>4 Q. When you say that indicators that you rely</p> <p>5 upon or that you recommend your clients implement,</p> <p>6 I'm not sure I got your wording exactly right, but</p> <p>7 what do you mean? What indicators do you rely upon?</p> <p>8 What do you recommend your clients implement?</p> <p>9 A. Well, the biggest thing is a screening</p> <p>10 tool right? The evidence-based screening tool are</p> <p>11 the best indicators to me. You can look at somebody</p> <p>12 with a history of STIs, you can look at -- you know,</p> <p>13 there's dental indicators you can look at. There</p> <p>14 are all kinds of indicators out there but they're</p> <p>15 primarily medical based, right? Barring a medical</p> <p>16 evaluation, then you're looking at the</p> <p>17 evidence-based screening tools of which I think I</p> <p>18 mentioned there were recent systematic review which</p> <p>19 identified 41 different screening tools. The</p> <p>20 indicators in there are the ones that I'm talking</p> <p>21 about. Not the indicators that someone paying cash</p> <p>22 or renting by the hour, right? I'm talking about</p> <p>23 the real indicators. Not ones that are a bunch of</p> <p>24 yahoos sitting in a room going ah, that sounds like</p> <p>25 a good idea.</p>

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<p>1 Q. Do those indicators that you're referring</p> <p>2 to in your opinion apply to the hospitality setting?</p> <p>3 A. They don't. But that's kind of my point,</p> <p>4 right? That's what I'm trying to draw your</p> <p>5 attention to is that there are indicators that are</p> <p>6 evidence-based. But there is no reasonable</p> <p>7 practical way to implement that same stuff in a</p> <p>8 hospitality environment, right?</p> <p>9 And then I went further than that, I said</p> <p>10 there are some things that just don't make a lot of</p> <p>11 sense to me, like I can't think of a good reason to</p> <p>12 rent a hotel by the hour other than the very small</p> <p>13 rare exception that I gave you.</p> <p>14 Q. So if you were engaged by a hotel in the</p> <p>15 years 2017 to 2019 to provide consulting services</p> <p>16 regarding mitigating a risk of sex trafficking at</p> <p>17 the hotel, are there any indicators, red flags,</p> <p>18 signs that you would have proposed that the hotel</p> <p>19 rely upon or use?</p> <p>20 MR. ALLUSHI: Objection.</p> <p>21 A. To identify trafficking?</p> <p>22 BY MR. BOUCHARD:</p> <p>23 Q. To mitigate the risk of sex trafficking?</p> <p>24 A. It's a phenomenal question. I -- again,</p> <p>25 the only thing that come to mind is the hourly</p>	<p>1 educating them on what they already think they are</p> <p>2 concerned about. But I think the biggest problem --</p> <p>3 and, look, I'm not trying to be flip about this.</p> <p>4 Sex trafficking is a big problem. I think the</p> <p>5 biggest problem right now is that people</p> <p>6 misunderstand the prevalence of it, right? I mean,</p> <p>7 in 2022 there's only 2,000 documented incidents</p> <p>8 throughout the entire country. In 2019 there's</p> <p>9 only, like, 1600 incidents throughout the entire</p> <p>10 country, right? So people are -- people have been</p> <p>11 told that this is a bigger problem than what it</p> <p>12 perhaps is whether by way, you know, of that movie</p> <p>13 that just came out a few months ago or whether</p> <p>14 they're seeing the signs every time they go to the</p> <p>15 barber or hair salon, right? There's a belief it's</p> <p>16 a bigger problem than what it actually is. In fact,</p> <p>17 one of the references I gave you is Ella Cockbain's</p> <p>18 book which talks about all these myths that exist</p> <p>19 about sex trafficking or human trafficking in</p> <p>20 general. So what would I -- I would first try to</p> <p>21 get them to understand reality. That's the first</p> <p>22 thing that I would do. And then they said, "Well,</p> <p>23 we don't care about reality. We still want to do</p> <p>24 something," I might talk about what does the future</p> <p>25 hold for being able to actually identify nefarious</p>
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<p>1 rentals. But even that's not specifically about</p> <p>2 trafficking, right? That's broader to include other</p> <p>3 kind of nefarious activities that people want that</p> <p>4 private space for. So I can't think of any -- like,</p> <p>5 again, you're just asking me, you know, without</p> <p>6 supporting evidence or anything. The only thing I</p> <p>7 think would be disconcerting would be the hourly</p> <p>8 rentals.</p> <p>9 Q. So if the hotel client -- assuming you</p> <p>10 consider them clients or customers, whatever -- if</p> <p>11 the hotel client that had engaged you to act as a</p> <p>12 consultant said, "Mr. Vellani, we're really intent</p> <p>13 on addressing the risk of sex trafficking. Can you</p> <p>14 please provide us with some materials that we can</p> <p>15 rely upon to train our staff? If you can't, what</p> <p>16 should we tell our staff?"</p> <p>17 MR. ALLUSHI: Objection.</p> <p>18 A. Again, good question. So I think what I</p> <p>19 would explain -- and this is what I continually do</p> <p>20 with my consulting clients -- is I try to educate</p> <p>21 them on both the actual threat, you know, about this</p> <p>22 particular incident, the actual threat specifically</p> <p>23 at their property. And then, obviously, you're</p> <p>24 telling me they have already got these concerns. So</p> <p>25 I probably don't need to spend a lot of time</p>	<p>1 activity in a room, whether it's people fencing</p> <p>2 stolen goods or selling drugs, prostituting or sex</p> <p>3 trafficking and then I would talk to them about the</p> <p>4 facial recognition cameras that I mentioned to you</p> <p>5 earlier.</p> <p>6 There's also some potential technology</p> <p>7 that exists today where you can count the number of</p> <p>8 times the guest room is open. The problem is most</p> <p>9 of that is when you open the guest room from the</p> <p>10 outside, right? Because you got typically</p> <p>11 electronic locks on the door and you can interrogate</p> <p>12 that lock to find out how many times that guest room</p> <p>13 is opened from the outside but you're not counting</p> <p>14 the number of times it's been open from the inside.</p> <p>15 So if you're a prostitute, you're typically opening</p> <p>16 the guest room from the inside and therefore you're</p> <p>17 not able to count the number of times that door is</p> <p>18 opened.</p> <p>19 But, you know, beyond that what would I</p> <p>20 advise them? Probably not a whole lot. I mean, if</p> <p>21 they still said we still want something, then, yes,</p> <p>22 sure. I would refer back to everything else that's</p> <p>23 out there in the industry. But I'm going to say --</p> <p>24 I'm going to give them -- I'm going to temper their</p> <p>25 expectations on what those things can do. That's</p>

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<p>1 part of my job is to educate my client. As a</p> <p>2 consultant, my job is to educate my client on what</p> <p>3 works and what doesn't, and what's promising. Sorry</p> <p>4 for the long, rambling answer.</p> <p>5 BY MR. BOUCHARD:</p> <p>6 Q. No, I appreciate the thoughtful response.</p> <p>7 I wanted to ask on page 14 and 15 of</p> <p>8 Plaintiffs' Exhibit 1, really looking more at</p> <p>9 page 15 of Plaintiffs' Exhibit 1 which is identical</p> <p>10 on Exhibits 2 and 3. You talk about staffing at the</p> <p>11 hotel and, obviously, we've already discussed</p> <p>12 staffing-related issues. I wanted to ask you a</p> <p>13 slightly different question which is do you have an</p> <p>14 opinion about what an appropriate guest to staff</p> <p>15 ratio is for a hotel like United Inn and Suites?</p> <p>16 A. No, I don't have an opinion on that. You</p> <p>17 know, I think, you know, that's more of a functional</p> <p>18 question for an individual hotel as to what their</p> <p>19 appropriate level of staffing is. I've come across</p> <p>20 some of these extended stay hotels that don't even</p> <p>21 have staff at night. Odd, but, you know, it is a</p> <p>22 practice for some hotels.</p> <p>23 Q. I take it you would not recommend that</p> <p>24 practice?</p> <p>25 A. I mean, I haven't looked at it enough to</p>	<p>1 A. Yes, sir.</p> <p>2 Q. And you have virtually identical sentences</p> <p>3 on pages 16 of Exhibits 2 and 3 about plaintiffs</p> <p>4 A.G. and G.W. respectively. What is your definition</p> <p>5 of kidnapping?</p> <p>6 A. So, you know, again, I would have to refer</p> <p>7 back to, you know, I typically use FBI UCR</p> <p>8 definitions, Uniform Crime Report definitions. I'm</p> <p>9 basically -- it's a physical abduction of someone.</p> <p>10 So against their will.</p> <p>11 Q. Are you planning or intending to testify</p> <p>12 at trial that any of the plaintiffs were not being</p> <p>13 held against their will?</p> <p>14 A. I think there's other experts involved in</p> <p>15 this case that will talk about that. I don't think</p> <p>16 that's going to be an opinion that I need to give.</p> <p>17 What I'm saying is there was not a physical</p> <p>18 abduction. That's the extent of what I'm saying.</p> <p>19 Q. And I assume your answers would be the</p> <p>20 same as to A.G. and G.W.'s cases?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Where at the bottom of page 16 off</p> <p>23 Plaintiffs' Exhibit 1, you say, "During the early</p> <p>24 part of her trafficking on November 14th, J.G. was</p> <p>25 detained by a De Kalb County Police Department</p>
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<p>1 be able to say one way or the other. Again, I found</p> <p>2 it odd because it was the first time I had ever seen</p> <p>3 that. You know, I would typically imagine that</p> <p>4 there would be some staff -- at least a staff member</p> <p>5 available to handle after hours check-ins but</p> <p>6 apparently this particular extended stay doesn't</p> <p>7 even allow after hours check-in. So...</p> <p>8 Q. On page 14 at the very bottom of</p> <p>9 Plaintiffs' Exhibit 1, page 14, you say that "The</p> <p>10 owner of United Inn has been an intermittent member</p> <p>11 of the Asian American Hotel Owners Association since</p> <p>12 1998."</p> <p>13 Do you see that?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Do you know if he was a member from 2017,</p> <p>16 2018 or 2019, in any of those years?</p> <p>17 A. As I recall, he wasn't able to pinpoint a</p> <p>18 specific year, the specific years where he was a</p> <p>19 member or not a member. So I don't have any</p> <p>20 understanding of that.</p> <p>21 Q. On page 16 of Plaintiffs' Exhibit 1 your</p> <p>22 first sentence talks about Plaintiff J.G. knowing</p> <p>23 her traffickers sufficiently to meet with him in</p> <p>24 person and you say kidnapping was not involved. Do</p> <p>25 you see that?</p>	<p>1 police officer at United Inn." Do you see that?</p> <p>2 A. Yes, sir.</p> <p>3 Q. What do you say that quote was "the early</p> <p>4 part of her trafficking"?</p> <p>5 A. Well, that's a wonderful question. I</p> <p>6 think her period of trafficking was October 7th of</p> <p>7 2018 to January of 2019. So if I recall what you</p> <p>8 just said, November, so that would be early part of</p> <p>9 her trafficking at United Inn. Let me be clear.</p> <p>10 That's at United Inn. So October, November,</p> <p>11 December, January. November would be, you know,</p> <p>12 within the first month.</p> <p>13 Q. Well, it would be about five, five and a</p> <p>14 half weeks later?</p> <p>15 A. Right. Yes.</p> <p>16 Q. No?</p> <p>17 A. Yes.</p> <p>18 Q. You say in the next sentence, that "J.G.</p> <p>19 did not ask the police officers for assistance."</p> <p>20 Do you see that?</p> <p>21 A. Yes, sir.</p> <p>22 Q. How do you know that?</p> <p>23 A. Because I watched the body camera footage</p> <p>24 and read a report regarding this incident.</p> <p>25 Q. Did you watch the entirety of the body</p>

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<p>1 camera footage?</p> <p>2 A. Well, again, I'll give you the same answer</p> <p>3 I gave you before. I'm always hamstrung by what</p> <p>4 attorneys give me, right? So based on what I have,</p> <p>5 I see no evidence of that.</p> <p>6 Q. Well, did the footage that you reviewed</p> <p>7 only include J.G. talking to the police or did it</p> <p>8 also include other people who you didn't know</p> <p>9 talking to the police?</p> <p>10 MR. ALLUSHI: I'm going to object to that.</p> <p>11 You can show him the video. I mean, you don't</p> <p>12 have to remember everything, Karim.</p> <p>13 THE WITNESS: Thank you.</p> <p>14 A. Listen, it's body camera footage. So it's</p> <p>15 typical body camera footage. There is typically</p> <p>16 more people there. In this instance I do remember</p> <p>17 there were multiple people there. I don't know what</p> <p>18 I don't have as far as what's on that video.</p> <p>19 BY MR. BOUCHARD:</p> <p>20 Q. I take it that you would defer to the</p> <p>21 evidence and testimony at trial since you were not</p> <p>22 there yourself on November 14th?</p> <p>23 A. Yes, of course.</p> <p>24 Q. What is your recollection of what the</p> <p>25 videos show?</p>	<p>1 parking lot at United Inn and Suites?</p> <p>2 A. I don't know that I know that. That is</p> <p>3 what I suspect, but I don't know that I know that.</p> <p>4 I don't think those people were necessarily</p> <p>5 identified by their street names which were, you</p> <p>6 know, Shaq, Cash, and King.</p> <p>7 Q. Do you know why the police officers had</p> <p>8 gone to the United Inn on November 14th? Was it for</p> <p>9 a sex trafficking-related call or was it for</p> <p>10 something else?</p> <p>11 A. If I'm not mistaken, I believe it was a</p> <p>12 robbery.</p> <p>13 MS. RICHENS: Let me object to the</p> <p>14 question about traffickers, quote, being in the</p> <p>15 vicinity when J.G. was speaking to the police.</p> <p>16 I think that's a vague terminology.</p> <p>17 BY MR. BOUCHARD:</p> <p>18 Q. On the bottom of page 16, Plaintiffs'</p> <p>19 Exhibit 1, you say, Mr. Vellani, that "United Inn</p> <p>20 and Suites was not aware of any incidents involving</p> <p>21 J.G. contemporaneously. J.G. never reported the</p> <p>22 incidents to United Inn and Suites."</p> <p>23 What does that mean, "not aware of any</p> <p>24 incidents involving J.G. contemporaneously"?</p> <p>25 A. So based on the November incident I don't</p>
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<p>1 A. It showed -- let me -- the part of the</p> <p>2 video that's coming to mind is the part where the</p> <p>3 police car is sitting there, and there's a bunch of</p> <p>4 people gathered around the police officer. He's</p> <p>5 talking to multiple ones of them. I might be</p> <p>6 confusing this also with the report. Because in the</p> <p>7 report she gives her name as Chameeka Grimes which I</p> <p>8 believe was her cousin. So I don't know if that</p> <p>9 came from the police department or that came from</p> <p>10 the cameras, from the body cameras. You know, it</p> <p>11 was multiple people involved in this.</p> <p>12 Q. Based on the -- your recollection of the</p> <p>13 videos, is your recollection that the video footage</p> <p>14 that you reviewed was at the United Inn and Suites?</p> <p>15 A. Yes, sir.</p> <p>16 Q. It wasn't at the police department or some</p> <p>17 other location?</p> <p>18 A. No. I believed it was at the location.</p> <p>19 Q. Which is, as you know, one of the hotels</p> <p>20 where Plaintiff J.G. alleges she was trafficked, is</p> <p>21 that right?</p> <p>22 A. Yes.</p> <p>23 Q. And to your knowledge, sir, were some of</p> <p>24 Plaintiff J.G. traffickers in her immediate vicinity</p> <p>25 when she was talking to the police officer in the</p>	<p>1 know that they knew that that was the missing</p> <p>2 person. That's number one. Number two, again, she</p> <p>3 didn't ask for help from United Inn using, you know,</p> <p>4 one of the several different communication methods</p> <p>5 she had with them. There was a number three there</p> <p>6 but I can't remember what it is.</p> <p>7 The bottom line is, I mean, they didn't</p> <p>8 know about it at the time she was there.</p> <p>9 Q. Are you testifying that is, in fact, true?</p> <p>10 Is that your opinion, or are you saying based on the</p> <p>11 discovery materials you've reviewed and the</p> <p>12 deposition testimony you've reviewed, that's your</p> <p>13 conclusion?</p> <p>14 A. Yes, the latter.</p> <p>15 Q. But I take it you will defer to whatever</p> <p>16 the evidence and the testimony at trial will show?</p> <p>17 A. Yes, that's exactly what I'm saying here.</p> <p>18 I mean, that's based on my review of the case. So</p> <p>19 whatever comes out at trial, I'm happy to defer to</p> <p>20 that.</p> <p>21 Q. And there are different points in your</p> <p>22 report where you use language like there is evidence</p> <p>23 or there is no evidence of certain actions taken by</p> <p>24 United Inn or certain knowledge possessed by</p> <p>25 United Inn. Are you familiar with those terms that</p>

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<p>1 you used in your report, either there being evidence</p> <p>2 or there being no evidence?</p> <p>3 MR. ALLUSHI: Objection.</p> <p>4 A. Yes.</p> <p>5 BY MR. BOUCHARD:</p> <p>6 Q. And kind of similar to the question I just</p> <p>7 asked you, Mr. Vellani. Do you intend to testify at</p> <p>8 trial as to what, in fact, United Inn knew or what,</p> <p>9 in fact, United Inn did or will you defer to the</p> <p>10 evidence and testimony at trial?</p> <p>11 MR. ALLUSHI: Objection.</p> <p>12 A. So, I mean, what I can tell you is that my</p> <p>13 report is, obviously, based on the record as it</p> <p>14 exists at the time of the report. If something</p> <p>15 different happens in trial, I will defer to that.</p> <p>16 And I'll certainly be asking for dailies, you know,</p> <p>17 to review that if anything is different.</p> <p>18 BY MR. BOUCHARD:</p> <p>19 Q. Right. But what I'm trying to understand</p> <p>20 is are you planning to offer testimony at trial</p> <p>21 about what, in fact, United Inn knew or did?</p> <p>22 A. I don't know exactly how to answer your</p> <p>23 question. If I'm asked what is my understanding of</p> <p>24 the facts, I will recite those facts at trial. If</p> <p>25 something is different that's in the record at</p>	<p>1 just geared -- for better or worse, the law</p> <p>2 enforcement realm is only now gearing up to deal</p> <p>3 with this even though it was in the 20- -- in the</p> <p>4 2018 TVPRA. So bottom line on this is if you look</p> <p>5 at the Uniform Crime Report, specifically the</p> <p>6 national incident-based reporting system data for</p> <p>7 DeKalb County, they don't report any incidents of</p> <p>8 human trafficking. My guess is that we'll continue</p> <p>9 to see that number go up and up and up as law</p> <p>10 enforcement is trained to separate prostitution from</p> <p>11 trafficking. And then hopefully we'll get better at</p> <p>12 reporting and then we'll get better at crime</p> <p>13 prevention and we'll start to solve this problem and</p> <p>14 you'll see that number come back down. That would</p> <p>15 be my big picture, you know, guesstimate about that.</p> <p>16 Q. Sorry. I didn't mean to speak over you.</p> <p>17 Were you finished?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Okay. You're, obviously, aware that the</p> <p>20 FBI investigated and the Department of Justice</p> <p>21 prosecuted Zaccheus Obie and Kikia Anderson for</p> <p>22 trafficking A.G. and G.W. in 2017 at the United Inn.</p> <p>23 Are you aware?</p> <p>24 A. The Obie brothers, yes. I don't know who</p> <p>25 this other third person is that you're referring to.</p>
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<p>1 trial, then, obviously, I would defer to that. So</p> <p>2 hopefully I'm answering your question.</p> <p>3 Q. And, obviously, your knowledge of the case</p> <p>4 is limited by the access you've been given or not</p> <p>5 given to the materials from the case. Is that fair?</p> <p>6 A. Well, that, and my own independent</p> <p>7 investigation by way of the crime stats and my</p> <p>8 interview of Mr. Shareef and my site inspection to</p> <p>9 the extent that provides anything.</p> <p>10 Q. On page 18 of Plaintiffs' Exhibit 1 you</p> <p>11 say that -- in that third bullet point, and this is</p> <p>12 language that also appears in Plaintiffs' Exhibits 2</p> <p>13 and 3, you said the DeKalb Police Department not</p> <p>14 report any human trafficking incidents to the FBI in</p> <p>15 2017 or 2018. Do you see that?</p> <p>16 A. Yes, sir.</p> <p>17 Q. What does that mean to you?</p> <p>18 A. Well, again, it goes back to this notion</p> <p>19 that we're very early on in the development of</p> <p>20 trying -- of law enforcement trying to solve these</p> <p>21 crimes. Like I told you when I gave you the 2022</p> <p>22 statistics, nationwide there were only 2,000</p> <p>23 incidents that are documented in the FBI files. And</p> <p>24 I told you that unequivocally there would be fewer</p> <p>25 incidents in earlier years because I think we are</p>	<p>1 I may have come across this name but it's not coming</p> <p>2 to me right now.</p> <p>3 Q. Is it your opinion that there was no minor</p> <p>4 sex trafficking in DeKalb County in 2017 or 2018?</p> <p>5 MR. ALLUSHI: Objection.</p> <p>6 A. No. I think we've got a record here of</p> <p>7 such activity, right? What I'm saying is that there</p> <p>8 was nothing reported to DeKalb County, from DeKalb</p> <p>9 County to the FBI of any incidents. And think I</p> <p>10 that goes back to incorrectly identifying victims as</p> <p>11 criminals sometimes.</p> <p>12 BY MR. BOUCHARD:</p> <p>13 Q. Just -- sorry. Go ahead.</p> <p>14 A. No. I'm sorry. My bad.</p> <p>15 Q. Just under that bullet point, page 18,</p> <p>16 Plaintiffs' Exhibit 1.</p> <p>17 A. Yes, sir.</p> <p>18 Q. You say that you applied a methodology</p> <p>19 called the Uniform Crime Reporting methodology. Do</p> <p>20 you see that?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Is that methodology referenced in the</p> <p>23 IAPSC Forensic Methodology?</p> <p>24 A. I believe it is. I'm not opening another</p> <p>25 file. I'm just simply opening the methodology. I</p>

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<p>1 don't want to make it into something else.</p> <p>2 Q. That's what I was going to ask you to do</p> <p>3 anyway, if you could. Appendix B to Plaintiffs'</p> <p>4 Exhibit 1.</p> <p>5 A. So, yeah, it's on -- it's in the</p> <p>6 references section on page 7 of the methodology.</p> <p>7 Q. Can you point me to it?</p> <p>8 A. If you look at the forensic methodology,</p> <p>9 page 7, it's numbered in the bottom right corner.</p> <p>10 Q. Yes, sir.</p> <p>11 A. I lost it now. Bear with me.</p> <p>12 Q. Okay.</p> <p>13 A. U.S. Department of Justice.</p> <p>14 Q. Yes. Okay. Thank you. On page 22 of</p> <p>15 Plaintiffs' Exhibit 1, you have this tri- -- and</p> <p>16 I'll represent again this is identical to page 22 of</p> <p>17 Plaintiffs' Exhibits 2 and 3. You have this</p> <p>18 triangle that shows offender, place, target, victim</p> <p>19 and then on an exterior triangle, handler, manager,</p> <p>20 guardian. Do you see that triangle?</p> <p>21 A. Yes, sir.</p> <p>22 Q. And, obviously, in the middle of it all is</p> <p>23 crime?</p> <p>24 A. Correct.</p> <p>25 Q. Okay. So what I would like to understand</p>	<p>1 everyday life come across crime opportunities. And</p> <p>2 people in the course of their everyday life come</p> <p>3 across, you know, activities that they do. And some</p> <p>4 of those people are criminals.</p> <p>5 So that resulted in this triangle which is</p> <p>6 originally just the inner circle. Today it sits</p> <p>7 with the inner and outer triangle -- not circle,</p> <p>8 excuse me, triangle -- and then there's now a third</p> <p>9 triangle around it. So this is called the problem</p> <p>10 analysis triangle or the new crime triangle. And</p> <p>11 what it basically says is in order for a crime to</p> <p>12 occur, there has to be a target or victim. So if</p> <p>13 we're talking about property, it would be the</p> <p>14 target. So that would be jewelry, the purse, the</p> <p>15 wallet, whatever. If it's a person-on-person crime</p> <p>16 it could be a victim. Or the victim that owns the</p> <p>17 target.</p> <p>18 And then the third -- the second element</p> <p>19 that has to be in place is that there has to be an</p> <p>20 offender. And then that offender typically comes</p> <p>21 across, you know, the opportunity for a crime</p> <p>22 through his routine activities.</p> <p>23 And then the third element is for there to</p> <p>24 be a place for them to converge in time and space</p> <p>25 for the crime to occur.</p>
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<p>1 is can you sort of apply that analysis and that</p> <p>2 triangle, if you will, to these cases and sort of</p> <p>3 explain to me who are the offenders, who are the</p> <p>4 targets, victims, what was the place, who was the</p> <p>5 handler, handlers, who is the manager, who is the</p> <p>6 guardian?</p> <p>7 A. Yes, sir. So in order for a crime --</p> <p>8 number one, this has its genesis in what is called</p> <p>9 routine activities theory. Routine activities</p> <p>10 theory is one of the three preeminent theories that</p> <p>11 come under the category of environmental</p> <p>12 criminology. So the routine activity theory was</p> <p>13 developed by a guy named Marcus Felson who just</p> <p>14 retired from --</p> <p>15 (Clarification requested by stenographer.)</p> <p>16 A. Marcus Felson. He just retired from a</p> <p>17 university here in Texas. He was the -- when I</p> <p>18 first got to know him he was the dean -- when I say</p> <p>19 got to know him, I mean from afar. When I first got</p> <p>20 to know him from afar, he was the dean at Rutgers</p> <p>21 School of Criminal Justice in New Jersey. He was</p> <p>22 primarily with the home office in England.</p> <p>23 So Dr. Felson came up with routine</p> <p>24 activities theory. And basically what that talks</p> <p>25 about is how people throughout the course of their</p>	<p>1 So if you remove one of those elements,</p> <p>2 the crime doesn't occur. That's the theory. Okay.</p> <p>3 Now, the outside triangle is called the</p> <p>4 controller triangle. Okay. So the three elements</p> <p>5 there are the three controllers. Handler, manager,</p> <p>6 and guardian. There is a third triangle that I</p> <p>7 mentioned that is not shown on here that is still a</p> <p>8 theory that's in development that are called super</p> <p>9 controllers. And I do think super controllers come</p> <p>10 into play here as well. So guardians are protective</p> <p>11 of a target or a victim. Most guardians are</p> <p>12 self-guardians. In other words, if I'm going to do</p> <p>13 a site inspection and a, you know, high crime --</p> <p>14 very high crime property, I'm probably not wearing a</p> <p>15 fancy watch or driving a fancy car because I don't</p> <p>16 want to become victimized, right?</p> <p>17 So the idea is I'm engaging in</p> <p>18 self-guardianship. Ms. Richens, I'm assuming is not</p> <p>19 driving to the gas station with her windows down</p> <p>20 pumping gas with her Louis Vuitton sitting on the</p> <p>21 passenger's side seat. Okay, because she's engaging</p> <p>22 in self-guardianship. So most guardianship is</p> <p>23 self-guardians.</p> <p>24 If you're talking about a parking lot of a</p> <p>25 grocery store, the bystanders in the area are</p>

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<p align="right">Page 154</p> <p>1 guardians as well. They're bystanders, they're 2 serving to some extent as a deterrent. They're the 3 ones that can call the police. They're the ones 4 that can alert management.</p> <p>5 On the offender's side of things, the 6 handler is a person that controls the offender. So 7 historically that's been church. That's been 8 school. You could also say a handler would be a 9 corrections officer. It could be, you know, a 10 community intervention specialist. It's somebody 11 that affects the behavior of the offender.</p> <p>12 On the place side, you have a manager who 13 is responsible for the activities of that place. It 14 probably helps to identify place which I think is 15 also defined in the report. A place is a very 16 small, has a known geographic location, contained 17 within defined property boundaries, serves one 18 general function and has a legal authority to 19 control the use of the place. So in this situation 20 the place is, obviously, United Inn. You could say 21 that there's an interior element and an exterior 22 element to the place. But generally speaking, 23 United Inn is the place. Though we can acknowledge 24 there is interior private space and exterior common 25 areas.</p>	<p align="right">Page 156</p> <p>1 probably the best place to talk about it. The 2 manager has super control over it. He's got funding 3 from ostensibly a bank. If you think about -- I 4 don't know enough about the Epstein issue, but I 5 know, like, the banks were sued because they enabled 6 his trafficking. That's why they were sued. They 7 were super controllers. I've had situations with 8 apartments where a bank will call me and want me to 9 do an assessment of on an apartment complex that 10 they are going to fund. The bank is acting as a 11 super controller. If the crime can't get under 12 control, maybe they don't fund that apartment 13 complex rehabilitation. So we've taken the manager 14 out of it. We've taken the place out of it. The 15 super controller is not providing the funding.</p> <p>16 In this situation you've got DeKalb County 17 who identifies this as a high crime property. I 18 don't really understand how they did that. I'm not 19 disputing it but I have no understanding what that 20 methodology was. But what I do not see, I do not 21 see DeKalb County engaging with United Inn and 22 acting as a super controller and saying, "Hey if you 23 don't get the crime problem under control we're 24 going to file a nuisance abatement lawsuit on you." 25 Okay. And what I don't see is the police officers</p>
<p align="right">Page 155</p> <p>1 So a manager is basically responsible for 2 the smooth functioning of the place. In this case, 3 it's a hotel. The place is a hotel. So the smooth 4 functioning of the place is that people are coming 5 to rent rooms. They're getting access to the rooms. 6 They're getting the amenities they need. They have 7 a smooth checkout process. They leave the property, 8 housekeeping comes in, cleans the room and makes it 9 available for the next tenant, the next guest. That 10 is in essence what a place manager does.</p> <p>11 There is a new theory that is in 12 development called place management theory that has 13 some documentation thus far, okay, that talks about 14 how a place manager can affect the security posture 15 of a place. Again, that's in development. Good 16 stuff. Hopefully gets better as we move forward in 17 time.</p> <p>18 But ultimately, what the problem analysis 19 triangle says is that in order for a crime to 20 occur -- to not occur you have to remove one of the 21 three elements. And you can remove one of the three 22 elements by using that controller triangle, or what 23 I mentioned was the super controller triangle.</p> <p>24 So let's just talk about that for one 25 second. If you talk about the manager which is</p>	<p align="right">Page 157</p> <p>1 going and talking to the bad guys, the traffickers 2 and saying, "Hey, you know, you guys need to get 3 this guy under control. He needs to stop engaging 4 in whatever bad activities he's engaging in."</p> <p>5 And then and the guardianship side, the 6 super controller would basically typically be the 7 parents, right? The parents, the foster homes, you 8 know, the schools, what have you.</p> <p>9 So in order -- and your question is great. 10 Because this problem analysis triangle I use as a 11 framework for assessing any kind of crime. Okay? 12 So where do I see opportunities here is that -- I 13 use the problem analysis triangle to identify 14 opportunities for intervention. Okay. And to stop 15 the crime. I hope I answered your question.</p> <p>16 Q. I think you did. Can you just -- thank 17 you for that walk-through. Can you just sort of 18 directly, if it's possible, tell me who each of 19 these people are in this case or in these cases? In 20 other words the place is, obviously, United Inn and 21 Suites. I think that's obvious. The offender, I 22 believe, are the traffickers or the alleged 23 traffickers. Can you sort of continue down that 24 path for me and just identify directly who fits in 25 each of those buckets in these cases?</p>

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<p>1 A. Sure. So J.G. -- I'm sorry -- yes, J.G., 2 A.G. and G.W. would be the victims. The guardians 3 would have been ostensibly the parents because 4 they're minors. The offenders would be the Obie 5 brothers and this other Anderson person you're 6 talking about. And then Cash, King and Shaq would 7 be the offenders. The handlers for those folks, I 8 don't know who those folks are. I don't know if 9 they were on probation. I don't know who these guys 10 were or whether they had handlers. Certainly not 11 effective handlers. The place would be the 12 United Inn. But like I mentioned earlier, the place 13 could also be -- there's an inside component and an 14 outside component, right? It's kind of like if you 15 were running a mall that -- or your office, for 16 example, I'm assuming you're sitting in a law office 17 somewhere. You are responsible for the interior of 18 your leased space. The renter, the guest, is 19 responsible for the interior of their space, right? 20 So if she choose to let in a bad person that's kind 21 of on them, right? I provided you as the hotel 22 owner I provided you with locks on the doors and 23 maybe a peephole but ultimately you're responsible 24 for what is going inside your room. 25 So there is an inside/outside component.</p>	<p>1 15-year-old and she's clamoring for social media and 2 I refuse to let her have it. So -- because I -- you 3 know, I don't want her to do it. She's also 4 cognizant of the dangers of some parts of social 5 media. So she herself engages in self-guardianship. 6 So just by the fact that that she's a minor does not 7 mean that she can't be engaged in self-guardianship. 8 So I think my answer is that, yes, a minor 9 can engage in self-guardianship. They do it all the 10 time. They don't just leave their phones laying 11 around on a public bus, for example. They engage in 12 guardianship over that phone, right? 13 Q. On page 23 of Plaintiffs' Exhibit 1, the 14 first full paragraph says, "Furthermore, criminology 15 has shown," and then it goes on from there. Let me 16 know when you see that? 17 A. Yes, sir. I'm there. 18 Q. Okay. I wanted to ask you, and, again, 19 this paragraph from page 23 is also in Plaintiffs' 20 Exhibits 2 and 3 in the A.G. and G.W. cases. And 21 you talk about area crime can be used for 22 comparative purposes, and specifically a place could 23 be compared to other places with similar 24 characteristics in the area. Did you compare 25 United Inn to other places with similar</p>
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<p>1 Your point earlier about the common areas, that's on 2 the management that's on United Inn's owner, period, 3 right? So the owner -- the place is United Inn 4 inside/outside. And then the manager would be, you 5 know, for the common areas it's definitely 6 United Inn. 7 For the interior of the leased guest room 8 right, or rented guest room, that would be the 9 person that is, you know, renting the room. 10 Q. You said, and your report says this, too, 11 that most guardianship is self-guardianship, that is 12 people taking action to protect themselves? 13 A. Yes, sir. 14 Q. Does that apply to minors as well? In 15 other words as a security expert who gives advice to 16 hotels on mitigating sex trafficking risks, do you 17 expect minors to exercise self-guardianship? 18 A. So I've actually been thinking about this 19 question a lot. You know, I don't know if I 20 anticipated your question, but I've been thinking 21 about this a lot. I think the law -- and I'm not a 22 lawyer -- but the law seems to be very clear on the 23 actual consent part of the sex act. That is not 24 within the purview of the minor. However, I think 25 any of us with children, you know, I've got a</p>	<p>1 characteristics in its area? 2 A. No. The whole purpose of this section is 3 to basically say this notion of a high crime area is 4 a misnomer. Like, you know, the example that I 5 typically give and you're not from Houston. I know 6 you're not familiar with Houston. There is an area 7 north of Houston in the Intercontinental Airport 8 that -- it's called Greenspoint, and people for 9 years called it Gunspoint. And HPD, the Houston 10 Police Department went out from and did -- the crime 11 analysts did a deep dive on the crime stats and 12 identified really there was only three properties, 13 three specific places that had high crime. Those 14 three places contributed entirely to the reputation 15 of Gunspoint. So they sent HPD officers out there 16 to go get the crime problem under control at those 17 three properties. And once they did, Gunspoint lost 18 its reputation and people started referring to it as 19 Greenspoint. Post-COVID it's back to being called 20 Gunspoint again. Though I'm not sure how many bad 21 places there are that are contributing to that 22 reputation. 23 So the purpose of this section is really 24 to say that, you know, calling something a high 25 crime area is somewhat of a misnomer. What I did do</p>

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<p>1 in this case is I did the deep dive on the crime</p> <p>2 statistics for United Inn and I also reviewed the</p> <p>3 DeKalb County data which identified United Inn in</p> <p>4 that top five hot spot analysis. Though I don't</p> <p>5 fully understand what they predicated that analysis</p> <p>6 on.</p> <p>7 Q. So you did not, if I'm understanding you</p> <p>8 correctly, compare United Inn to other hotels with</p> <p>9 similar characteristics in its area. Is that fair?</p> <p>10 A. I didn't personally do it. It was already</p> <p>11 done as part of the analysis. As part of DeKalb</p> <p>12 County's analysis.</p> <p>13 Q. Page 25 of Plaintiffs' Exhibit 1, which,</p> <p>14 again, is identical to page 25 of Plaintiffs'</p> <p>15 Exhibits 2 and 3. Talks of nonstranger crimes being</p> <p>16 difficult or more difficult to prevent than stranger</p> <p>17 crimes?</p> <p>18 A. Correct.</p> <p>19 Q. Is it your opinion that minor sex</p> <p>20 trafficking cannot be prevented when it is a</p> <p>21 nonstranger crime?</p> <p>22 MR. ALLUSHI: Objection.</p> <p>23 A. I'm not saying it can't be prevented. I'm</p> <p>24 saying that you've got to look at that -- you know,</p> <p>25 if you're looking at the stuff through the frame of</p>	<p>1 give you just sort of explain that so the</p> <p>2 intervention part makes sense. If you've got a</p> <p>3 domestic violence incident, you're not likely to</p> <p>4 deter or prevent that kind of crime. If you think</p> <p>5 about -- I don't know if you used to watch cops back</p> <p>6 in the days, I think it's back on TV again. You</p> <p>7 would always see the police officer wait for backup</p> <p>8 when responding to a domestic violence incident.</p> <p>9 The reason for that is those are very volatile</p> <p>10 situations that are not going to be prevented by the</p> <p>11 mere fact that a police officer is standing there.</p> <p>12 Okay? So preventing is not really the objective.</p> <p>13 The goal then turns to intervention. So</p> <p>14 once the officer has backup, you know, then they</p> <p>15 will intervene, separate the parties and, you know,</p> <p>16 under some state laws take one party to prison --</p> <p>17 excuse me -- to jail. So intervention basically</p> <p>18 means that you could possibly intervene though it is</p> <p>19 dangerous. If there is a security officer, a</p> <p>20 bouncer in a club and you have a bar brawl, two guys</p> <p>21 fighting over politics or sports, you know, you're</p> <p>22 probably not going to prevent that thing but you</p> <p>23 could intervene though it's probably dangerous. So</p> <p>24 intervention simply means you can stop the crime as</p> <p>25 it's going on. You cannot prevent it.</p>
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<p>1 that problem analysis triangle, there are multiple</p> <p>2 places where it can be mitigated, right? There are</p> <p>3 certain things a place manager can do. There are</p> <p>4 probably a whole lot more things that the</p> <p>5 guardianships can do. In other words, the parents,</p> <p>6 society, church whatever. And there are probably</p> <p>7 things that can impact that offender. So, no, I'm</p> <p>8 not saying that. I think this is a nonstranger</p> <p>9 crime by virtue of the fact this wasn't, like, a</p> <p>10 forced abduction, a physical abduction, you know, of</p> <p>11 these three individuals. This was somebody that</p> <p>12 they became familiar with through, you know, social</p> <p>13 media or through word of mouth in the case of A.G.</p> <p>14 and G.W. So they're nonstranger by that virtue but</p> <p>15 I think in general, nonstranger crimes are harder to</p> <p>16 prevent. They're not crimes of opportunity for the</p> <p>17 most part.</p> <p>18 BY MR. BOUCHARD:</p> <p>19 Q. What do you mean when you say intervention</p> <p>20 once the crime is under way is possible?</p> <p>21 A. Well, I hate to say it, I mean, this</p> <p>22 paragraph really goes to more the -- to -- to, you</p> <p>23 know, like, the carjackings in a parking lot, right?</p> <p>24 In other words, that deterring and preventing the</p> <p>25 crime are really challenging. And the example I can</p>	<p>1 Q. On page 26 of Plaintiffs' Exhibit 1, you</p> <p>2 talk about calls for service. For instance,</p> <p>3 crimes -- and this also appears in Plaintiffs'</p> <p>4 Exhibit 2 and 3. I wanted to ask you about the</p> <p>5 specific language that appears at the top of page 27</p> <p>6 where you say "When assessing crime risk, calls for</p> <p>7 service should not be used alone and when better</p> <p>8 information (offense incident data and offense</p> <p>9 incident reports) is available, calls for service</p> <p>10 have little value."</p> <p>11 Do you see that?</p> <p>12 A. Yes, sir.</p> <p>13 Q. There's language about using calls for</p> <p>14 service data in Appendix B to your reports. Which</p> <p>15 is the IAPSC safe forensic methodology as I'm sure</p> <p>16 you're aware. That particular language when</p> <p>17 assessing crime risk calls for service should not be</p> <p>18 used alone and when better information is available,</p> <p>19 calls for service have little value. Do you agree</p> <p>20 that language is not in the IAPSC Forensic</p> <p>21 Methodology that appears in Appendix B? And if you</p> <p>22 need to take a look at Appendix B, obviously, feel</p> <p>23 free.</p> <p>24 A. Wait a minute. Let me see if I</p> <p>25 understand. You're saying on the top of page 27</p>

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<p align="right">Page 166</p> <p>1 that when assessing crime risk calls for service 2 should not be used alone when better information is 3 available. And calls for service have little value 4 and you want me to compare that to what's in the 5 forensic methodology?</p> <p>6 Q. That's correct. And if it's helpful, I 7 mean, obviously, feel free to look at the entirety 8 of Appendix B, the forensic methodology. I thought 9 you were referring to footnote 1 on page 4 of 10 Appendix B which has virtually identical language to 11 what's on pages 26 and 27 except for that part that 12 I just read about calls for service having little 13 value. So that's what I'm trying to understand. Is 14 that language in the forensic methodology document 15 or is it not?</p> <p>16 A. The little value part is not. So keep in 17 mind that I'm on the committee that writes this 18 forensic methodology. And the language -- that 19 whole language in footnote number 1 is language that 20 I wrote and got approved by the forensic committee 21 and ultimately the membership.</p> <p>22 So, I mean, obviously, I've iterated on 23 that since the time of the report. I've written 24 extensively. I've written two books on this. So 25 you're looking at -- I think 2014 language if I</p>	<p align="right">Page 168</p> <p>1 was an actual list of offenses, which is great. 2 Which is exactly what I would prefer. But calls for 3 service depends on the jurisdiction. And in some 4 jurisdictions there is a direct correlation between 5 a call for service and the crime. In some 6 jurisdictions you'll have an initial call type and 7 then you'll have a final call type. So what I'm 8 primarily concerned about is the final call type. 9 If you look at Las Vegas, for example, their calls 10 for service are utter garbage and then basically 11 unusable but they don't give you anything else. So 12 you got to rely on that as a stepping stone to a 13 second request which is for the police reports. 14 Which is what I think you guys did in this case as 15 well as what I did to backfill some of the missing 16 reports.</p> <p>17 So the calls for service for the most part 18 are a stepping stone to get to the police reports, 19 okay. Because I don't know how to request the 20 police reports for a property. I need to give the 21 police department specific numbers. I get those 22 case numbers from the calls for service. So calls 23 for service are nothing more than somebody called 24 the police. Could be an emergency number. Could be 25 a nonemergency number as well, could be a police</p>
<p align="right">Page 167</p> <p>1 remember correctly. In the forensic methodology 2 then you're looking at 2023 language, you know, that 3 I've iterated on. I'm not trying to quote the 4 forensic methodology, in other words.</p> <p>5 Q. Understood. And that's what I just wanted 6 to clarify. Because a lot of footnote 1 in the 7 forensic methodology that's Appendix B appears on 8 pages 26 and 27 of your report.</p> <p>9 A. Yes, in the report. I authored both, yes.</p> <p>10 Q. But the little value language about calls 11 for service does not appear in the forensic 12 methodology document in Appendix B and I just wanted 13 to confirm with you that you agree?</p> <p>14 A. Yes. Yes. That language is not in the 15 forensic methodology.</p> <p>16 Q. Is it your opinion that calls for service 17 are not relevant to conducting a risk assessment of 18 a hotel?</p> <p>19 MS. RICHENS: Objection.</p> <p>20 A. You have to go back and think about what 21 calls for service are, right? They are literally 22 someone calling -- it depends on the jurisdiction. 23 Every jurisdiction is different. You can think 24 about it in this case. When I requested the calls 25 for service from DeKalb County, what they sent me</p>	<p align="right">Page 169</p> <p>1 officer happening upon a crime, okay, or happening 2 upon something suspicious and then later identifying 3 it's not a crime. But the problem with calls for 4 service, again, depending on the jurisdiction, you 5 may get everything. You may get fire calls. You 6 may get ambulance calls. You may get police calls. 7 You may get cats stuck up in trees. You may get the 8 vicious pit bull calls. The calls for service are 9 not the meaningful data. They are only meaningful 10 in that they get you to the second set of data which 11 is the police reports.</p> <p>12 I got to be honest, I don't know if any of 13 this stuff is relevant for this case because I don't 14 know what you got when you made your request, but 15 when I made my request, they gave me actual 16 offenses.</p> <p>17 MR. BOUCHARD: If everybody is okay, let's 18 go about maybe five more minutes and then we 19 can take a break. I realize we've been on for 20 a while. Is that okay with everybody?</p> <p>21 MS. RICHENS: Yes.</p> <p>22 THE WITNESS: Okay.</p> <p>23 BY MR. BOUCHARD:</p> <p>24 Q. On page 27, Mr. Vellani, Plaintiffs' 25 Exhibit 1, you have a paragraph in the middle of the</p>

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<p align="right">Page 170</p> <p>1 page that starts "in this matter." You see that?</p> <p>2 A. On 27?</p> <p>3 Q. Page 27 of Plaintiffs' Exhibit 1, in the</p> <p>4 middle of the --</p> <p>5 A. Oh, yes, yes.</p> <p>6 Q. Okay. And you're familiar with that</p> <p>7 paragraph?</p> <p>8 A. Yes.</p> <p>9 Q. I can represent it also appears in</p> <p>10 Plaintiffs' Exhibits 2 and 3. There's a sentence</p> <p>11 there towards the end of the paragraph that says,</p> <p>12 "Further, there is no evidence that," do you see</p> <p>13 that?</p> <p>14 A. Yes, that's that super controller part</p> <p>15 that I was talking about earlier. That is, you</p> <p>16 know, what I'm looking for is for the city, the</p> <p>17 authority having jurisdiction, the police department</p> <p>18 to engage with the property to help them get the</p> <p>19 crime problem under control. You'll see that in</p> <p>20 some cases or some projects. You know, I can't find</p> <p>21 any evidence here where the police department was</p> <p>22 engaging with the property to help them get the</p> <p>23 crime problem under control as DeKalb County saw it.</p> <p>24 Q. Have you seen a letter from April 2017</p> <p>25 from the De Kalb County Police Department to the</p>	<p align="right">Page 172</p> <p>1 and was talking about the DeKalb County Police</p> <p>2 Department responding to calls for service at the</p> <p>3 United Inn and Suites approximately two to three</p> <p>4 times per week. Is that deposition testimony that</p> <p>5 you're familiar with or no?</p> <p>6 A. Well, not specifically. I mean, I vaguely</p> <p>7 remember something about this, but I don't remember</p> <p>8 the context.</p> <p>9 Q. Are you aware of evidence of the</p> <p>10 United Inn asking the De Kalb Police Department for</p> <p>11 recommendations on security at the property?</p> <p>12 MR. ALLUSHI: Objection.</p> <p>13 A. You mean the police department or the guys</p> <p>14 that work there?</p> <p>15 BY MR. BOUCHARD:</p> <p>16 Q. The police department.</p> <p>17 A. No, I don't.</p> <p>18 Q. Okay. Are you aware of evidence of the</p> <p>19 United Inn asking the De Kalb Police Department to</p> <p>20 train hotel staff on sex trafficking?</p> <p>21 A. No, sir.</p> <p>22 No.</p> <p>23 Q. Sorry. What did you say, sir?</p> <p>24 A. No.</p> <p>25 Q. Okay. all right. The last question before</p>
<p align="right">Page 171</p> <p>1 United Inn and Suites?</p> <p>2 A. What year was that, sir?</p> <p>3 Q. April 2017.</p> <p>4 A. Oh, I'm sorry. I thought that was the</p> <p>5 date. April 2017. I don't know, sir. You'd have</p> <p>6 to show it to me and see I've seen it before. I</p> <p>7 don't know.</p> <p>8 Q. Have you reviewed deposition testimony</p> <p>9 about the De Kalb Police Department visiting the</p> <p>10 hotel two to three times per week?</p> <p>11 A. Yes. But are you talking about police</p> <p>12 officers responding there? Or going there to</p> <p>13 investigate vice crimes? Are we talking about C.D.</p> <p>14 King's deposition? I'm trying to understand what</p> <p>15 we're referring to.</p> <p>16 Q. I'm talking about Tahir Shareef and</p> <p>17 Ashar Islam's depositions about the volume of DeKalb</p> <p>18 County Police Department visits and response to</p> <p>19 calls for service?</p> <p>20 A. Yes. I mean, I certainly read their</p> <p>21 depositions and their exhibits to those depositions.</p> <p>22 But I don't know exactly what this April 27 letter</p> <p>23 is off the top of my head. I'm sorry. April 2017</p> <p>24 letter.</p> <p>25 Q. Well, and I actually moved on from that</p>	<p align="right">Page 173</p> <p>1 we take a brief break. So on page 27 you -- of the</p> <p>2 respective expert reports, you talk about the</p> <p>3 operative time period. So page 27 of Exhibit 1, you</p> <p>4 say the operative time period for the crime analysis</p> <p>5 is January 1, 2014 to January 31, 2019. And then if</p> <p>6 you look at Plaintiffs' Exhibit 2, for example, at</p> <p>7 page 27, it says the operative time period for the</p> <p>8 crime analysis is January 1, 2014 to July 21, 2017.</p> <p>9 So it looks like you used over five years for J.G.</p> <p>10 but about three and a half years for A.G. and G.W.</p> <p>11 Is that correct?</p> <p>12 A. Yes. The forensic methodology reports we</p> <p>13 can look at three to five years of data. My normal</p> <p>14 practice is look at three calendar years and then up</p> <p>15 until the date of the incident in the subject year.</p> <p>16 So my normal practice would be what I did in A.G.</p> <p>17 and G.W. But I didn't want to cut short the</p> <p>18 analysis in J.G. So I went ahead and used more than</p> <p>19 five years.</p> <p>20 MR. BOUCHARD: Okay. All right. Let's go</p> <p>21 off the record, please.</p> <p>22 THE VIDEOGRAPHER: Okay. Time on the</p> <p>23 monitor is 2:19 p.m. and we are off the record.</p> <p>24 (Recess 2:19 p.m. until 2:35 p.m.)</p> <p>25 THE VIDEOGRAPHER: Time on the monitor is</p>

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<p>1 2:35 p.m. and we are back on the record.</p> <p>2 BY MR. BOUCHARD:</p> <p>3 Q. Mr. Vellani looking at page 27 of</p> <p>4 Plaintiffs' Exhibit 1. You -- at the bottom of</p> <p>5 page 27 you list certain crimes that you call,</p> <p>6 "noteworthy."</p> <p>7 Do you see that on the bottom of page 27</p> <p>8 of Plaintiffs' Exhibit 1?</p> <p>9 A. Yes, sir.</p> <p>10 Q. And I'll represent to you that there is</p> <p>11 similar language and a similar list on Plaintiffs'</p> <p>12 Exhibits 2 and 3. Looking at page 27 at that</p> <p>13 language of Plaintiffs' Exhibit 1, what makes those</p> <p>14 crimes that you have listed there noteworthy crimes,</p> <p>15 to use your language?</p> <p>16 A. So this is, you know, you've got a good</p> <p>17 question there. I mean, I think the problem that we</p> <p>18 have with this is really what I say on 28. There is</p> <p>19 no evidence. There is no evidence that -- the</p> <p>20 problem I'm having is I'm trying to find correlation</p> <p>21 between sex trafficking and other crimes and I'm not</p> <p>22 finding it. If you, for example, look at instances</p> <p>23 of rape in an apartment unit, you will oftentimes</p> <p>24 also look at burglaries, right? If somebody can</p> <p>25 break in to steel, they can break in to rape</p>	<p>1 of the crimes in the actual body of the report and I</p> <p>2 chose those crimes.</p> <p>3 Q. And just to repeat what I think you said,</p> <p>4 correct me if I'm wrong, you decided to include</p> <p>5 certain crimes that you thought were more serious.</p> <p>6 Is that the distinction, or how did you decide what</p> <p>7 to include?</p> <p>8 A. Yeah. So, again, absence of correlation</p> <p>9 between other crimes and trafficking, right? That's</p> <p>10 the biggest issue. So what I did is I included all</p> <p>11 of Appendix C which is all the crimes at United and</p> <p>12 the, you know, the other -- the crimes against</p> <p>13 persons. The crimes against property. The crimes</p> <p>14 against society. I've included all that in</p> <p>15 Appendix C. I felt compelled to include something</p> <p>16 in the body of the report. So using the typical</p> <p>17 premises security lens, I included the violent</p> <p>18 crimes. The crimes against persons, and then I went</p> <p>19 one step further and included, you know, the</p> <p>20 prostitution events, even though, you know, they're</p> <p>21 supposed to be distinguished from trafficking. So</p> <p>22 that's the short answer. What I did not include is</p> <p>23 property crimes.</p> <p>24 Q. Is it your testimony that there was only</p> <p>25 one death at the United Inn in the five years</p>
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<p>1 ostensibly is the argument. I can't find</p> <p>2 correlation between trafficking and other crimes.</p> <p>3 I'm going to give you just a quick example and then</p> <p>4 I'll go on and explain this. I have some very</p> <p>5 high-end clients with, you know, six-star hotels, or</p> <p>6 \$10,000 a month for a one-bedroom apartment unit.</p> <p>7 And they have had trafficking. But they don't have</p> <p>8 violent crimes on the property. They don't have</p> <p>9 rapes on the property. They don't have prostitution</p> <p>10 on the property but they have had trafficking. So I</p> <p>11 actually can't find correlation between other crimes</p> <p>12 beginning trafficking. Okay. So in the absence of</p> <p>13 that, the only thing I can do was look at this</p> <p>14 through the typical premises filter which is, you</p> <p>15 know, here are the violent crimes that have occurred</p> <p>16 and here are the prostitution crimes which, you</p> <p>17 know, we sometimes try to talk about -- when we talk</p> <p>18 about trafficking you need to know the 2008</p> <p>19 Wilberforce TVPRA tells us to distinguish between</p> <p>20 trafficking and prostitution.</p> <p>21 So all I'm saying is these are the more</p> <p>22 serious crimes. I didn't look at -- thefts and all</p> <p>23 that other stuff are summarized in Appendix C. But,</p> <p>24 you know, that's the best explanation of why I'm</p> <p>25 saying noteworthy. I felt compelled to include some</p>	<p>1 preceding January 2019?</p> <p>2 A. Well, that's a good question. Only one</p> <p>3 death or only one murder?</p> <p>4 Q. Well, either. Only one murder?</p> <p>5 A. Well, I don't know about deaths. I mean,</p> <p>6 people can die of natural causes at hotels. You</p> <p>7 know, there's only one murder that is listed in the</p> <p>8 record. There are several people dead. Those could</p> <p>9 have suicide or natural causes.</p> <p>10 Q. On page 28 of Plaintiffs' Exhibit 1.</p> <p>11 A. I'm sorry, what page?</p> <p>12 Q. Page 28 of Plaintiffs' Exhibit 1.</p> <p>13 A. Yes, sir.</p> <p>14 Q. There is language in a section called</p> <p>15 inherent threats and this also is language in</p> <p>16 Plaintiffs' Exhibits 2 and 3. Tell me when you're</p> <p>17 at that section.</p> <p>18 A. I'm there.</p> <p>19 Q. It says, the last sentence of that</p> <p>20 section, "To the extent that," and then it says,</p> <p>21 "Sex trafficking could be considered inherent threat</p> <p>22 though the dearth of prevalent data described above</p> <p>23 temperate concern."</p> <p>24 What do you mean sex trafficking could be</p> <p>25 considered an inherent threat?</p>

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<p>1 A. Well, I mean that it's the private space, 2 right? So somebody could use the private rented 3 space for a number of, you know, elicit behaviors. 4 It could be, you know, extramarital affairs. It 5 could be drug use. It could be building a bomb. It 6 could be collecting, you know, weapons like they did 7 at the MGM Grand and they did the mass shooting. 8 You know, the privacy of the guest room is really 9 what's at issue here. So within the confines of a 10 myriad of other crimes that could occur, you could 11 build a meth lab in a private guest room, right? It 12 has happened before. That's what I mean that sex 13 trafficking could be one of those crimes that occur 14 just by virtue of the privacy of the guest room.</p> <p>15 Q. The first sentence on page 28, Plaintiffs' 16 Exhibit 1, underneath the section entitled 17 Awareness.</p> <p>18 A. Yes.</p> <p>19 Q. That's there being no evidence of United 20 Inn and Suites financially benefiting. Do you see 21 that?</p> <p>22 A. Yes, sir.</p> <p>23 Q. I've asked you sort of a similar style of 24 question at different points of the deposition to 25 the one that I'm about to ask you, which is I take</p>	<p>1 3, you define crime pattern at the top of page 26. 2 Do you see that?</p> <p>3 A. Yes, sir.</p> <p>4 Q. And is that -- as we sit here today, is 5 that still your definition of crime pattern or do 6 you have any changes to it? I assume you don't but 7 just confirming.</p> <p>8 A. Yes. It's not my definition. It's the 9 one promulgated by the International Association of 10 Crime Analysts.</p> <p>11 Q. On page 28, going back to page 28, the 12 last paragraph says, "Staff that entered guestrooms 13 e.g. housekeeping," and then it goes on to talk 14 about what they're required to report. Do you see 15 that?</p> <p>16 A. Yes, sir.</p> <p>17 Q. And you talk about you use the phrase 18 suspicious items or activities in a guest room. Do 19 you see that?</p> <p>20 A. Yes, sir.</p> <p>21 Q. And I'll represent to you that same 22 paragraph is in Plaintiffs' Exhibits 2 and 3 as 23 well. Do you know what United Inn and its staff 24 considered, quote, suspicious items or activity in a 25 guest room?</p>
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<p>1 it that you will defer to what the evidence and 2 testimony at trial show and leave it to the fact 3 finder to make decisions about United Inn and 4 Suites' liability or no liability. Is that correct?</p> <p>5 A. Yes.</p> <p>6 Q. Page 28 of Plaintiffs' Exhibit 1, the 7 second paragraph in the awareness section talks 8 about United Inn not being aware of pimps overseeing 9 prostitutes. Similar type of question there. I 10 assume you'll defer to the evidence and testimony at 11 trial?</p> <p>12 A. Yes, sir.</p> <p>13 Q. And two sentences later you say, "There is 14 no evidence in this matter that a pattern of 15 prostitution," and you go on from there "was 16 observable to United Inn and Suites staff."</p> <p>17 Again, will you defer to the evidence and 18 testimony at trial?</p> <p>19 A. Yes, sir.</p> <p>20 MR. ALLUSHI: I'm going to object to the 21 questions about evidence testimony at trial, 22 all of those.</p> <p>23 BY MR. BOUCHARD:</p> <p>24 Q. On page 26, Mr. Vellani, of Plaintiffs' 25 Exhibit 1 and the same on Plaintiffs' Exhibits 2 and</p>	<p>1 A. No, that wasn't explicit. But when 2 talking to Mr. Shareef, you know, I don't think he 3 gave me an explicit example. But he -- I think the 4 term either in his deposition or in the interview 5 was anything unusual. That would be not in keeping 6 with, you know, a typical guest room. Like, if 7 somebody walked into that room in the MGM Grand and 8 found 40 assault weapons. You know, obviously, 9 unusual. Somebody building a meth lab, you know, 10 unusual, right? So that type of thing. But I don't 11 think we got into, you know, what specific things 12 that they would be looking for other than anything 13 unusual.</p> <p>14 Q. Do you know if they would have considered 15 drug paraphernalia in a room anything unusual?</p> <p>16 A. I don't know. I mean, you'd have to ask 17 them. But I would imagine that they would consider 18 it suspicious given that it's, you know, drug 19 paraphernalia, right? It's illegal.</p> <p>20 Q. What about guns?</p> <p>21 A. What about guns? Is that what you said?</p> <p>22 MR. ALLUSHI: Objection.</p> <p>23 A. I mean, I don't know if they would 24 consider that unusual or not. I mean, you know, I 25 sometimes have my gun with me when I go to a bad</p>

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<p>1 area and keep it in the hotel. So I don't know what</p> <p>2 they would consider unusual. I think probably that</p> <p>3 would be unusual because people don't typically want</p> <p>4 their gun just laying around. But I don't know.</p> <p>5 That's a question for them.</p> <p>6 BY MR. BOUCHARD:</p> <p>7 Q. Do you know if they would have considered</p> <p>8 video cameras in the room unusual?</p> <p>9 A. I don't know if they would or not.</p> <p>10 Q. Large amounts of cash in the room?</p> <p>11 MS. RICHENS: Objection.</p> <p>12 A. I would imagine they would consider that.</p> <p>13 Again, these are questions for them. He said, you</p> <p>14 know, basically it was the testimony or the</p> <p>15 interview was anything unusual.</p> <p>16 BY MR. BOUCHARD:</p> <p>17 Q. Okay. So is that the extent of your</p> <p>18 knowledge about what suspicious items or activity in</p> <p>19 a guest room were anything unusual or can you</p> <p>20 provide any more detail on that?</p> <p>21 A. Well, I think the example that he gave</p> <p>22 perhaps -- I don't know if it was in both the</p> <p>23 interview -- I think it was in both -- you know, was</p> <p>24 a large number of people would also be considered</p> <p>25 unusual and suspicious and they would try to</p>	<p>1 just not the norm.</p> <p>2 Q. On page 29 you say that, Plaintiffs'</p> <p>3 Exhibit 1, the last sentence of that top most</p> <p>4 paragraph on page 29 starts with "there is no</p> <p>5 evidence." Do you see that?</p> <p>6 A. Yes, sir.</p> <p>7 Q. And there's a similar sentence in</p> <p>8 Plaintiffs' Exhibits 2 and 3 on pages 29 in those</p> <p>9 reports. Similar question what I've asked, will you</p> <p>10 defer at trial to the evidence and testimony of the</p> <p>11 witnesses?</p> <p>12 A. Yes, sir.</p> <p>13 Q. On page 29 in your reports, you talk about</p> <p>14 code violations. Do you agree -- based on my</p> <p>15 understanding of what you've written here, it</p> <p>16 appears that a 1 percent increase in code</p> <p>17 enforcement in LA, New York and Seattle was</p> <p>18 associated with a .1 to .6 percent decrease in</p> <p>19 violent crime.</p> <p>20 So in LA, New York and Seattle, was it</p> <p>21 true that an increase in code enforcement was</p> <p>22 associated with a decrease in violent crime, is that</p> <p>23 correct?</p> <p>24 MR. ALLUSHI: Objection.</p> <p>25 A. Yes. I mean, that's what it shows. I</p>
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<p>1 investigate that further or ask the person to, you</p> <p>2 know, reduce the number of people or leave the</p> <p>3 property. I think that was the specific example</p> <p>4 that he used.</p> <p>5 Q. Do you know if minors loitering in a</p> <p>6 parking lot late at night, meeting with different</p> <p>7 adult men for short periods of time would have been</p> <p>8 considered suspicious activity?</p> <p>9 MS. RICHENS: Objection.</p> <p>10 MR. ALLUSHI: Objection.</p> <p>11 A. I don't know. Do they know they're</p> <p>12 minors? That's the biggest problem, right? We</p> <p>13 don't know if they're minors or not. But, you know,</p> <p>14 I would suspect that would raise some suspicion. It</p> <p>15 might be part of the reason why they had police</p> <p>16 officers there.</p> <p>17 BY MR. BOUCHARD:</p> <p>18 Q. Do you know how United Inn staff was to</p> <p>19 know what qualified as suspicious items or activity?</p> <p>20 A. I don't know if in the deposition that was</p> <p>21 explored beyond anything unusual. And I don't</p> <p>22 recall, I mean, if I would have asked him, I would</p> <p>23 have written it up. But I probably didn't ask him</p> <p>24 either specifically, you know, how they determined</p> <p>25 what would be suspicious other than, you know, it's</p>	<p>1 think we're talking about miniscule numbers at this</p> <p>2 point, right? I mean, I think that's the issue</p> <p>3 there. I mean, it was fascinating because I think</p> <p>4 your question to Mr. Shareef was -- I mean, you had</p> <p>5 a similar question. That's what prompted me to go</p> <p>6 and look this up to see if there's any relationship</p> <p>7 there. And this is the only study that I could find</p> <p>8 on this topic. But you're talking about itty-bitty</p> <p>9 numbers.</p> <p>10 BY MR. BOUCHARD:</p> <p>11 Q. On page 30 you say that United Inn</p> <p>12 conducted informal security risk assessments of the</p> <p>13 property. Do you see that?</p> <p>14 A. Yes, sir.</p> <p>15 Q. What do you mean by informal security risk</p> <p>16 assessments?</p> <p>17 A. So Mr. Shareef would talk to Weber and</p> <p>18 McClelland about any problems on the property.</p> <p>19 There was this whole notion of him going to these</p> <p>20 various trainings put on by the tourism board in the</p> <p>21 county themselves with respect to at least</p> <p>22 trafficking in prostitution were discussed. So if</p> <p>23 you think about the security measures that are in</p> <p>24 place, you can see evidence of the informal risk</p> <p>25 assessments being conducted. And then when I talked</p>

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<p align="right">Page 186</p> <p>1 to him, that is one of the questions I asked him, is</p> <p>2 if they had ever done something informal as opposed</p> <p>3 to hiring, you know, somebody like me to come out</p> <p>4 and evaluate what the security needs are. And the</p> <p>5 way he explained to me how he arrived at his</p> <p>6 decisions indicated there was an informal security</p> <p>7 risk assessment process that he was implementing, I</p> <p>8 don't want to say realtime, but it was something</p> <p>9 more than that, you know, every five years, we're</p> <p>10 going to hire a security consultant, right? It was</p> <p>11 something more than that. It was something</p> <p>12 occurring not realtime but not irregular, like,</p> <p>13 every five years.</p> <p>14 Q. I take it it's not your testimony that</p> <p>15 Mr. Shareef or Mr. Islam have expertise in</p> <p>16 conducting risk assessments?</p> <p>17 A. No. But I think it is pretty common for</p> <p>18 property managers, place managers to, you know,</p> <p>19 assess security needs. Do they have the</p> <p>20 qualifications that I have? No. But I don't want</p> <p>21 to diminish, you know, that they can do some things</p> <p>22 on their own or at least make a determination that,</p> <p>23 hey, I need to talk to the police officers about</p> <p>24 this or, hey, I need to go hire a security</p> <p>25 consultant if it's a deeper problem. I mean, I'm</p>	<p align="right">Page 188</p> <p>1 and Suites about enhancing or modifying or improving</p> <p>2 or refining or what have you security at the hotel?</p> <p>3 MR. ALLUSHI: Objection.</p> <p>4 A. No, they're not my client.</p> <p>5 BY MR. BOUCHARD:</p> <p>6 Q. They have not asked you to do a security</p> <p>7 risk assessment?</p> <p>8 A. No.</p> <p>9 Q. On pages 30 and 31 of your reports you</p> <p>10 talk about certain rules of the hotel. For example,</p> <p>11 the top of page 31 you talk about rules of conduct</p> <p>12 applicable to guests. Are you familiar with what</p> <p>13 I'm describing?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Do you know whether the hotel rules at the</p> <p>16 United Inn were enforced?</p> <p>17 A. We have evidence that they were being</p> <p>18 enforced because he gave examples of -- he gave</p> <p>19 examples of when there were too many people going in</p> <p>20 and out of a room, he would ask them to leave or</p> <p>21 then he also gave examples of people that didn't</p> <p>22 follow the rules, he would trespass them from the</p> <p>23 property. He also gave examples of situations where</p> <p>24 people were not allowing access to the room and</p> <p>25 didn't renew their -- their folio -- their --</p>
<p align="right">Page 187</p> <p>1 sure we all live at homes with door locks and window</p> <p>2 locks and maybe secondary locks. And perhaps some</p> <p>3 of those decisions were decisions we made. Not the</p> <p>4 builder. You know, some of us are putting LED</p> <p>5 lighting up around our homes or cameras up around</p> <p>6 our homes, Ring doorbells. You know, those are part</p> <p>7 of the informal security risk assessment process</p> <p>8 that results in something tangible and visible</p> <p>9 indicating that informal assessment.</p> <p>10 Q. If United Inn had called you in 2017,</p> <p>11 2018, or 2019 and asked you whether you recommended</p> <p>12 they conduct a formal security risk assessment, what</p> <p>13 would you have said?</p> <p>14 MR. ALLUSHI: Objection.</p> <p>15 A. The answer would be -- that's my cell. So</p> <p>16 I would recommend they do that. You know, we</p> <p>17 would -- most of us security consultants that exist</p> <p>18 that are independent would be extraordinarily busy</p> <p>19 if every property did that. Yeah, if they called</p> <p>20 and wanted an assessment, I would send them a</p> <p>21 proposal and may or may not get the gig. They may</p> <p>22 not like the fact that I have a CPP, who knows.</p> <p>23 BY MR. BOUCHARD:</p> <p>24 Q. Have you in the course of your work in</p> <p>25 this case made any recommendations to the United Inn</p>	<p align="right">Page 189</p> <p>1 their -- their -- he didn't renew their stay. I</p> <p>2 think if I'm recalling correctly, Weber and/or</p> <p>3 McClelland also talked about when they saw</p> <p>4 suspicious activity, management would go in and ask</p> <p>5 the people to leave or trespass them from the</p> <p>6 property. So I do see evidence that they were</p> <p>7 enforcing the rules, including ones that were not</p> <p>8 specifically explicitly listed.</p> <p>9 Q. Forgive me if I've asked you this question</p> <p>10 already. I don't think I have. I know I asked you</p> <p>11 some questions related to training that you might</p> <p>12 provide to a hotel. But I wanted to ask you</p> <p>13 directly. Do you think that in 2017 to 2019 hotels</p> <p>14 should have offered staff trainings on sex</p> <p>15 trafficking?</p> <p>16 MR. ALLUSHI: Objection.</p> <p>17 A. I struggle with this, Mr. Bouchard,</p> <p>18 because the research on training does not to date</p> <p>19 show that it's effective at changing outcomes.</p> <p>20 Okay. The studies that have been done thus far</p> <p>21 primarily talk about whether people can simply</p> <p>22 recall what they learned. You know, I sat through a</p> <p>23 National Center for Missing Exploited Children</p> <p>24 training as I was working on something on the</p> <p>25 consulting side. I'll be the first to admit I</p>

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<p>1 wasn't fully engaged in it. I was doing two 2 different windows on my monitor. You know, and do I 3 recall parts of it? Sure. Do I think there's 4 anything that was in that training that was going to 5 help me change any outcomes for it? I don't think 6 so. There's no studies that show that training is 7 effective at changing the outcomes. And I'm going 8 to give you one example and, you know, again, I'm 9 assuming that counsel has provided you with the a 10 list of the references that I sent. There is a 11 paper by Caitlin, Caitlin Wings (phonetic). It was 12 published in 2022. That study found that if you go 13 so far as to tell the person, a layperson, that 14 there was sex between a minor and an adult, that 15 only 61 percent of those folks could even 16 acknowledge that that's a crime. 21 percent of 17 those people, 21 percent of the 61 percent identify 18 the crime as prostitution. And only 5 percent 19 identified it as trafficking, right? So we got this 20 very -- we've got a problem with this issue. Like, 21 I love the idea of training. I think training has a 22 place. I recommend training to my clients in 23 various areas. But on this trafficking front, I'm 24 not seeing where any current training is effective 25 at changing outcomes here. And that to me is</p>	<p>1 Q. Okay. And did it start for you in 2009 as 2 a result of the passage of the William Wilberforce 3 law that you discussed? 4 A. Indirectly. I wasn't aware of its passage 5 in 2008. I became aware of it in 2009 when the City 6 of Houston engaged me. 7 Q. Trying to focus on the 2017 to 2019 time 8 period because, obviously, that's when the incidents 9 at issue occurred. And I'd like to focus on 10 hospitality environments specifically. During that 11 time period, what were you advising hospitality 12 companies that engaged you, hotels that engaged you 13 on what steps to take to mitigate the risk of sex 14 trafficking? 15 MR. ALLUSHI: Objection. 16 A. I don't know that I have an answer for 17 that. Because I don't know how to search my memory 18 and narrow this down to those three years. I mean, 19 what I can tell you is I didn't have any hotels that 20 were doing hourly rentals. So I wouldn't have made 21 a recommendation to not do something that they 22 weren't already doing. I don't have an answer, sir. 23 That's kind of a -- you know, I don't know how to 24 answer that. I don't know -- you know, that's just 25 a hard question to answer.</p>
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<p>1 really, really concerning. Especially in light of 2 this '22 study, this 2022 study that's showing that, 3 you know, you're explicitly stating that sex 4 occurred between a minor and adult and only 5 61 percent of the people are saying it's a crime, 6 and only 5 percent of that subset are saying it's 7 trafficking. I mean, that's a real problem. So I 8 don't know that I'm recommending training other 9 than, you know, check the box, say you did it. But 10 I'm not sure that we're changing outcomes here. 11 That what I'm struggling with. 12 BY MR. BOUCHARD: 13 Q. I think you said that as part of your work 14 as a consultant for the hospitality industry you 15 have been engaged to conduct risk assessments for 16 hotels, and as part of that, you have considered the 17 risks of sex trafficking, is that correct? 18 A. Yes, sir. 19 Q. And did you engage in that work from the 20 years 2017 to 2019? 21 A. I think I've been engaging in that kind of 22 work since, you know -- I've been engaging in hotel 23 work since I started or shortly after I started my 24 company. The actual topic of sex trafficking didn't 25 really start for me until 2009.</p>	<p>1 BY MR. BOUCHARD: 2 Q. On page 32 of Plaintiffs' Exhibit 1 as 3 well as Plaintiffs' Exhibits 2 and 3, you have a 4 section called Guest Management. 5 A. Yes, sir. 6 Q. That talks about a two-factor 7 authentication process? 8 A. Yes, sir. 9 Q. You know the paragraph I'm talking about? 10 A. Yes, sir. 11 Q. Are you going to testify at trial that 12 United Inn, in fact, followed that authentication 13 process or are you going to defer to what the trial 14 evidence and testimony shows? 15 A. I think both, right? I mean, if somebody 16 testifies to the contrary, that's fine. But I 17 still, you know, this is -- I'm told this is what 18 the process was. It's an extreme -- it's an extreme 19 thing. Just give you an example. I rented four 20 hotel rooms in Normal, Illinois back in May for me 21 and my other -- my subcontractors consultants on the 22 project. All the rooms were listed in my name. And 23 one of my guys lost his key and went to the front 24 desk and was able to get a key using his name. So 25 that's the norm, unfortunately, is that people are</p>

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<p>1 able to go get hotel room keys with relative ease at 2 hotels. It's a little bit disconcerting. If 3 somebody asked for who is on the registry, that's at 4 least one form of authentication. In this 5 situation, and I would say that probably would be 6 the better norm than what I've seen. But in this 7 case, you know, this is at least what they explained 8 to me how they did it, they would go out and do this 9 two-step process. They get the phone number from 10 the registry. Then they get the person that they 11 call because they don't know who is on the other end 12 of the line to give them the, you know, the last 13 four digits of their driver's license to confirm 14 that person. It's a pretty interesting process.</p> <p>15 Q. On page 33 of Plaintiffs' Exhibits 1, 2, 16 and 3, you talk about vehicle gates, if installed -- 17 this is in the middle of the page, the middle of the 18 physical security paragraph. Vehicle gates if 19 installed would cause traffic or reduce the number 20 of parking spots available. Do you see that?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Is it your testimony that United Inn was 23 prohibited from installing gates?</p> <p>24 A. I don't know if they were prohibited. 25 There have been times in my career where I've made</p>	<p>1 Q. The bottom of page 33 of Plaintiffs' 2 Exhibits 1, 2, and 3 talks about United Inn's video 3 surveillance system.</p> <p>4 A. Yes, sir.</p> <p>5 Q. Do you know what was the hotel's policy 6 and practice on reviewing security camera footage?</p> <p>7 A. Like, you mean reviewing in realtime?</p> <p>8 Q. Or after the fact. Either way.</p> <p>9 A. So a couple things. Number one, he told 10 me they would provide the video to the police upon 11 request. They didn't require a warrant. That after 12 incidents they would review the videos if necessary. 13 And then as far as proactive monitoring, the only 14 things I heard was that it could be monitored from 15 the office in realtime. But, you know, primarily 16 that was a night function because, obviously, 17 they're too busy, not obviously, but they were busy 18 during the day.</p> <p>19 Q. Would you have recommended as a security 20 consultant proactive monitoring of the surveillance 21 footage?</p> <p>22 A. So this is a question I get asked a lot by 23 my clients nowadays because there's a lot of 24 companies that are out there selling or leasing 25 cameras and then offering as a subscription service</p>
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<p>1 recommendations where they installed gates and they 2 have been prohibited. I don't know that they ever 3 asked the question to determine if they were 4 prohibited or not. The issue ultimately becomes one 5 of space. So in this situation if you look at the 6 distance between the street entry point to the 7 building sidewalk, the sidewalk around the building, 8 you'd have a really challenging time putting a 9 vehicle access gate. I'm not saying it's not 10 possible. You could put up a rollup gate. Your 11 typical swing gate you wouldn't have enough room, I 12 don't believe, to put in a gate without either doing 13 one of two things. Either, A, backing traffic up on 14 the street or you'd have to have a setback on that 15 gate so people can pull into the driveway to be able 16 to, you know, use the telephone entry system or call 17 the front desk or enter a code, you have to push 18 that gate in and then you'd have even less room to 19 open that gate. So I don't know if it was 20 physically possible to do it with a typical swing 21 gate. Now, again, a rollup gate would be a totally 22 different story. It would be extremely expensive. 23 And if you did -- if you did set the gate back into 24 the property, you'd be losing parking spots if you 25 were able to physically do it.</p>	<p>1 to be able to monitor in realtime. There have been 2 only a small handful of studies on that. Mostly by 3 a guy named Eric Piza out of Northwestern 4 University. Those studies show limited 5 effectiveness in terms of monitoring the cameras. 6 The question is for what, right? Are we monitoring 7 for suspicious activity? In this situation are we 8 monitoring for too many people going in and out of a 9 room? Are we monitoring for loitering? The 10 question is what are we monitoring for. But in 11 those studies -- and there's a study you can look 12 up; I'd happy to send it to you -- called Project 13 Green Light. It was implemented in Detroit. What 14 they did is install the cost of the -- they 15 installed cameras at specific hot spots. They also 16 installed some other security measures at certain 17 properties with the cameras. And then they put the 18 camera monitors at the 911 dispatch center, provided 19 law enforcement-type training to the dispatchers. 20 And then they had police officers driving around 21 these hot spot areas and when the dispatcher saw 22 something suspicious, they would dispatch the police 23 officers who were already nearby to respond 24 proactively. And that showed some effectiveness. 25 It's an extreme example of how they, you know, get</p>

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<p>1 to solve crime or prevent crime. But I think it's</p> <p>2 showing some effectiveness. There have not been</p> <p>3 enough studies on this in the private sector for me</p> <p>4 to say that it's going to make a whole lot of</p> <p>5 difference.</p> <p>6 Now, what I alluded to earlier with</p> <p>7 respect to the facial recognition cameras, if the --</p> <p>8 if you have facial recognition cameras, you don't</p> <p>9 really need monitoring. You can just set a</p> <p>10 threshold, hey, if there are three unique faces</p> <p>11 entering into a hotel room, send an alarm when this</p> <p>12 happens and I'll dispatch the manager or the</p> <p>13 off-duty police officer to that room to find out</p> <p>14 what's going on. That would make sense. That</p> <p>15 conceptually makes sense to me. But to just sit</p> <p>16 there and monitor these 36 cameras, you know, I</p> <p>17 don't know. I don't know how effective that would</p> <p>18 be.</p> <p>19 Q. Bottom of page 34, Plaintiffs' Exhibit 1</p> <p>20 and 2 and 3, you say that "The police officers</p> <p>21 schedule is based on time."</p> <p>22 This is in the last paragraph on paragraph</p> <p>23 34, kind of in the middle -- page 34, kind of in the</p> <p>24 middle, "The schedule was based on times of reduced</p> <p>25 hotel staffing at night."</p>	<p>1 center another half mile away because the kids are</p> <p>2 all walking that far. So there is no single answer</p> <p>3 to this. That's why you have to do the deep dive on</p> <p>4 the crime statistics to look for those patterns and</p> <p>5 trends.</p> <p>6 The only thing I can tell you specifically</p> <p>7 about this case is what the trends do show. And</p> <p>8 then you also have to take into account that</p> <p>9 informal security risk assessment process that</p> <p>10 Mr. Shareef was engaged in, that, hey, we have less</p> <p>11 staff. We got more people making noise hanging out</p> <p>12 and listening to loud music, that's why we're going</p> <p>13 to put the security, the police officers between</p> <p>14 10:00 p.m. and 2:00 a.m. and then at 2:00 a.m.</p> <p>15 things start to quiet down.</p> <p>16 BY MR. BOUCHARD:</p> <p>17 Q. And if I changed my question there to say</p> <p>18 what time of day do you believe commercial sex</p> <p>19 activity is most likely to occur at a hotel, would</p> <p>20 the answer that you just gave be the same?</p> <p>21 A. Yes, but it would be much harder, right?</p> <p>22 Because the original question was about all crime.</p> <p>23 And your question now is about, you know, CSA</p> <p>24 specifically -- commercial sexual activity</p> <p>25 specifically, you know, I don't know that there is a</p>
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<p>1 Do you see that, sir?</p> <p>2 A. Yes, sir.</p> <p>3 Q. And what -- in your experience, what time</p> <p>4 of day do you believe crime is most likely to occur</p> <p>5 at a hotel?</p> <p>6 A. So there's --</p> <p>7 MS. RICHENS: Objection.</p> <p>8 A. There's no single answer to that. I mean,</p> <p>9 you have to analyze the crime at a specific place to</p> <p>10 identify what the temporal trends are. I mean, you</p> <p>11 know, there are typical patterns and trends for</p> <p>12 specific properties. But those temporal patterns</p> <p>13 and trends are not consistent among all facilities</p> <p>14 of the same type.</p> <p>15 So, for example, you know, some shopping</p> <p>16 centers around where I live have more crime between,</p> <p>17 like, 3:30 to 6:30. And then, you know, for me,</p> <p>18 it's obvious because I'm looking for this stuff.</p> <p>19 Like, what's causing that. It's all those burglars</p> <p>20 and motor vehicles and shoplifting incidents are a</p> <p>21 result of the high school that's nearby. They get</p> <p>22 out of school at 3:30. They all head over, and you</p> <p>23 can see them heading over to the shopping center,</p> <p>24 right? So that trend at that particular shopping</p> <p>25 center is different from the trend at the shopping</p>	<p>1 pattern or trend to that. We don't have enough</p> <p>2 datapoints to be able to show any kind of trend with</p> <p>3 that.</p> <p>4 Q. On page 35 you say -- the last sentence on</p> <p>5 page 35 of Plaintiffs' Exhibits 1, 2, and 3, that</p> <p>6 "Even with a very high relative risk of crime, it is</p> <p>7 possible for security measures to be adequate and</p> <p>8 reasonable."</p> <p>9 I couldn't really figure out how that</p> <p>10 statement connected to the rest of the report. Can</p> <p>11 you explain why that's there and -- can you explain</p> <p>12 why that's there?</p> <p>13 A. Yes. I mean, there's three things. I</p> <p>14 mean, number one, Warren Sherman who I'm quoting</p> <p>15 there is probably one of the most preeminent</p> <p>16 criminologists of our time. He is the author of</p> <p>17 that whole thing I keep talking about what works,</p> <p>18 what doesn't, and what's promising, that's his</p> <p>19 phrase as well.</p> <p>20 In 1995 he was retained or commissioned by</p> <p>21 Congress to write report on crime prevention, what</p> <p>22 works, what doesn't and what's promising. So</p> <p>23 Warren Sherman in 1989 published this study called</p> <p>24 Violent Stranger Crime at a Large Hotel. That was a</p> <p>25 quote from there. And ultimately what he was</p>

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<p align="right">Page 202</p> <p>1 talking about is that security measures while -- you</p> <p>2 know, should meet the standard of care, even when</p> <p>3 those exist, crime can still happen. So my point is</p> <p>4 that even though the city had designated this as a</p> <p>5 high crime property, that even Mr. Shareef testified</p> <p>6 that it was a high crime area, you know, crime can</p> <p>7 still happen even when you put reasonable security</p> <p>8 measures in place.</p> <p>9 And in this situation, if you go back to</p> <p>10 my opinion, which is that they met the standard of</p> <p>11 care, even though they were meeting the standard of</p> <p>12 care, crime can still happen.</p> <p>13 Q. That ties in directly to what I was going</p> <p>14 to ask you next, which is looking at page 36 of</p> <p>15 Plaintiffs' Exhibit 1, 2, and 3, where you say</p> <p>16 "defendants met the applicable standard of care</p> <p>17 relating to security," what do you consider the</p> <p>18 applicable standard of care relating to security?</p> <p>19 A. So I think -- you haven't done in this</p> <p>20 case and I appreciate this. You haven't focused on</p> <p>21 gates, guns and guards so much, right? You're</p> <p>22 focusing on those operational security measures to</p> <p>23 find out, you know, what they're doing with respect</p> <p>24 to guest management, visitor management, you know,</p> <p>25 monitoring for nefarious activities, that kind of</p>	<p align="right">Page 204</p> <p>1 early as 2013 and 2014 which included sex</p> <p>2 trafficking and prostitution topics. He was also</p> <p>3 trained by the police department. I believe that</p> <p>4 was 2017. He attended that extended stay ordinance</p> <p>5 in either late 2017 or late 2016 or early 2017.</p> <p>6 That also addressed human trafficking. Of his own</p> <p>7 volition, he developed this four-page packet on</p> <p>8 human trafficking prevention which he made available</p> <p>9 in paper and electronically to staff. He, you know,</p> <p>10 also told me that he spoke with staff about this in</p> <p>11 2018. You know, the two-factor authentication I</p> <p>12 liked. I thought that was a good practice. Again,</p> <p>13 you know, even if they were using one factor, it's</p> <p>14 better than what the norm is which is, like, here,</p> <p>15 everybody gets a key, right? Like I experienced in</p> <p>16 May and was upset about.</p> <p>17 You know, they didn't have hourly rentals</p> <p>18 which I think is really, like, one thing that kind</p> <p>19 of stands out. Inspecting the rooms every seven</p> <p>20 days or they wouldn't renew the stay. They had</p> <p>21 loitering signs which goes into the physical</p> <p>22 security. They had communication methods. Front</p> <p>23 desk. Phones in the rooms. Obviously, people have</p> <p>24 cell phones, but they had somebody on staff there</p> <p>25 that could be available to the guests 24/7.</p>
<p align="right">Page 203</p> <p>1 stuff.</p> <p>2 So when I say the standard of care, it's</p> <p>3 not necessarily gates, guns and guards because the</p> <p>4 research on that doesn't show that to be all that</p> <p>5 effective. Where most properties meet the standard</p> <p>6 of care and what most facilities of a similar type,</p> <p>7 i.e., in other hotels, what they do are those</p> <p>8 operational measures, which, again, I applaud you</p> <p>9 because that's what you're focusing on.</p> <p>10 So when I see them doing good from an</p> <p>11 operational security perspective, is that they have</p> <p>12 a staff that's reported -- that's required to report</p> <p>13 suspicious items and activity. There was evidence</p> <p>14 that they were assisting domestic violence victims.</p> <p>15 They were conducting criminal background</p> <p>16 investigations to varying degrees depending on</p> <p>17 whether it was somebody the owner knew or was</p> <p>18 referred to or somebody outside -- outside that</p> <p>19 realm. They were conducting the informal risk</p> <p>20 assessments. They had the written management</p> <p>21 policies. They had the guest rules of conduct.</p> <p>22 They were posting the missing persons flyers in the</p> <p>23 office. He was attending training. I don't know</p> <p>24 whether he was a member of AA -- AHOA at that time</p> <p>25 or not. But he was attending various training as</p>	<p align="right">Page 205</p> <p>1 As far as physical security, they had the</p> <p>2 off-duty police officers; they had, you know,</p> <p>3 limited concealment opportunities outside the</p> <p>4 facility; they had staff that walked the property at</p> <p>5 night. They had police officers. They called the</p> <p>6 police department for too many people being in a</p> <p>7 room. And that ultimately led to at least one</p> <p>8 prostitution arrest which means they're actually</p> <p>9 doing the right things. Right, specifically on this</p> <p>10 issue.</p> <p>11 They didn't require a warrant. C.D. King</p> <p>12 testified to this. They didn't require a warrant</p> <p>13 for the video registry or even room access. I would</p> <p>14 expect hotels as far as meeting the standard of care</p> <p>15 to provide video in the guest registry. But to</p> <p>16 actually provide room access I think is above and</p> <p>17 beyond the standard of care.</p> <p>18 The off-duty police officers when they</p> <p>19 informed the manager or the clerk about high traffic</p> <p>20 in a room, the hotel would deal with it right away.</p> <p>21 They would ask the person to leave or be trespassed</p> <p>22 and then they maintained that do not rent list.</p> <p>23 Q. I want to take a look at Appendix B to</p> <p>24 Plaintiffs' Exhibits 1, 2, and 3. We've, obviously,</p> <p>25 talked a little bit about Appendix B already. It's</p>

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<p>1 the IAPSC Forensic Methodology?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Let me know when you're there.</p> <p>4 A. I'm there.</p> <p>5 Q. I received yesterday from your counsel</p> <p>6 a -- or from United Inn and Suites' counsel, excuse</p> <p>7 me, a revised version of this forensic methodology</p> <p>8 dated September 27, 2023. Which, obviously, is</p> <p>9 dated after your June 14th, 2023 reports in this</p> <p>10 case or these cases. I assume that the forensic</p> <p>11 methodology that's in Appendix B, which is on the</p> <p>12 front page, it says, "Updated January 29th, 2021,"</p> <p>13 that was the effective forensic methodology document</p> <p>14 at the time that you prepared and wrote your</p> <p>15 June 14th reports?</p> <p>16 A. Yes. But in fairness, there's no sub --</p> <p>17 there's no major difference with the actual</p> <p>18 methodology. The only thing that was changed on</p> <p>19 there was the format because I hated the two-column</p> <p>20 stuff. So I pushed for them to make that a</p> <p>21 one-column deal.</p> <p>22 And then we also added in -- we added in</p> <p>23 some additional references and we cited some other</p> <p>24 cases that cited the methodology.</p> <p>25 Q. On page 8 of Appendix B, I'm going to be</p>	<p>1 you to do?</p> <p>2 A. The only real thing it does is validate</p> <p>3 two things. A, that I'm a security consultant.</p> <p>4 And, B, and, most importantly, that I am an</p> <p>5 independent security consultant. In other words,</p> <p>6 I'm not a security consultant that also does private</p> <p>7 investigations or, worse, that I'm a security</p> <p>8 consultant that only recommends one product or one</p> <p>9 service. In other words, I don't work for, you</p> <p>10 know, a guard company that's doing security</p> <p>11 consulting work and only recommending security</p> <p>12 officers, right? I'm not a camera -- I don't work</p> <p>13 for a camera company. Meaning, that I only</p> <p>14 recommend cameras or one brand of cameras.</p> <p>15 So the independence means that I'm product</p> <p>16 agnostic. I only look at what the needs of the</p> <p>17 client are. And that is the only way that I'm</p> <p>18 allowed to make money. I'm not allowed to recommend</p> <p>19 specific products or services.</p> <p>20 Q. What do you mean when you say that it</p> <p>21 validates you as a security consultant?</p> <p>22 A. Well, I mean, because they're looking at</p> <p>23 the education and training. You know, and what your</p> <p>24 role is in your day-to-day worklife, right? They're</p> <p>25 verifying that you are, in fact, a security</p>
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<p>1 referring to Appendix B which, again, is the</p> <p>2 January 2021 version.</p> <p>3 A. Yes, sir.</p> <p>4 Q. Just to be clear, was this effective at</p> <p>5 the time that you prepared your report?</p> <p>6 A. Yes, sir.</p> <p>7 Q. Okay. On page 8, there's italicized</p> <p>8 language that says founded in 1984. And then it</p> <p>9 goes on from there. Do you see that?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Are you familiar with that language?</p> <p>12 A. Yes.</p> <p>13 Q. Do you agree with that language?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Is IAPSC a widely recognized and respected</p> <p>16 association committed to establishing and</p> <p>17 maintaining the highest standards for security</p> <p>18 consultants in the industry?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Has it, in fact, established and</p> <p>21 maintained the highest standards for security</p> <p>22 consultants in the industry?</p> <p>23 A. Yes, sir.</p> <p>24 Q. What is the significance of your being a</p> <p>25 member in IAPSC? What does that credential qualify</p>	<p>1 consultant. Not somebody that does primarily -- you</p> <p>2 know, keep in mind that IAPSC was really a response</p> <p>3 to guys that did 99 percent private investigations</p> <p>4 and occasionally they would advise someone on their</p> <p>5 security needs. So that's what the IAPSC was the</p> <p>6 result of and, you know, obviously, I wasn't around,</p> <p>7 back in -- I mean, I was physically around in '84, I</p> <p>8 wasn't in the business in '84. So it was a direct</p> <p>9 response to guys that were primarily private</p> <p>10 vendors.</p> <p>11 Today it stands more today for being</p> <p>12 product agnostic. Meaning, I don't work for a</p> <p>13 camera manufacturer. I don't only recommend ADT as</p> <p>14 your central monitoring center, right? So it's</p> <p>15 product agnostic, that independent part is the core</p> <p>16 of the association.</p> <p>17 Q. In layman's terms, how would you describe</p> <p>18 what is the IAPSC Forensic Methodology?</p> <p>19 A. So the forensic methodology is a framework</p> <p>20 for assessing matters in litigation to provide</p> <p>21 consistency with approach between cases and amongst</p> <p>22 members for developing the opinions.</p> <p>23 Q. On page 2 of Appendix B -- and I think</p> <p>24 this is related to what you were just saying -- it</p> <p>25 says underneath position statement that "The</p>

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<p>1 International Association of Professional Security</p> <p>2 Consultants does hereby recognize that its members</p> <p>3 will be called upon to perform as 'forensic</p> <p>4 consultants' and serve as expert witnesses in a</p> <p>5 court of law or other legal proceeding."</p> <p>6 Do you see that?</p> <p>7 A. Yes, sir.</p> <p>8 Q. And then it says, "The purpose of these</p> <p>9 guidelines is to meet the need for a standardized</p> <p>10 methodology using the evaluation of premises</p> <p>11 security cases."</p> <p>12 A. Yes, sir.</p> <p>13 Q. Do you agree with that?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Are members of the IAPSC authorized by</p> <p>16 IAPSC to serve as forensic consultants in premises</p> <p>17 security cases?</p> <p>18 A. So I want to draw a distinction between</p> <p>19 the words forensic security consultant and an expert</p> <p>20 witness. A forensic security consultant is</p> <p>21 basically a security consultant who says that they</p> <p>22 provide that service. It's not up to the IAPSC to</p> <p>23 deem you an expert. That's the role of the judge.</p> <p>24 I mean, you know, these two defense attorneys can</p> <p>25 hire me all day long but I don't get anywhere unless</p>	<p>1 association. And then at some point people started</p> <p>2 doing physical security stuff and they had a lot</p> <p>3 more architectural engineering background. So those</p> <p>4 are the physical security guys.</p> <p>5 And then there were guys that also, also</p> <p>6 in addition to one of those two things started doing</p> <p>7 forensic consultants, you know, serving as --</p> <p>8 holding themselves out as forensic consultants.</p> <p>9 So, no. They're not authorizing you to do</p> <p>10 anything. They're basically saying you are a</p> <p>11 security consultant. You are an independent</p> <p>12 security consultant.</p> <p>13 Q. Who do you believe is qualified to apply</p> <p>14 the IAPSC Forensic Methodology? Only members of</p> <p>15 IAPSC or other --</p> <p>16 A. Fortunately, it's widely used by most</p> <p>17 experts that I come across that are not members. So</p> <p>18 it is fortunately widely accepted by nonmembers as</p> <p>19 well as members.</p> <p>20 Q. Do you agree that at various points in</p> <p>21 Appendix B the forensic methodology asks forensic</p> <p>22 security consultants to use their judgment,</p> <p>23 experience, and expertise?</p> <p>24 A. Yes.</p> <p>25 Q. And that the IAPSC Forensic Methodology,</p>
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<p>1 the judge approves me, right?</p> <p>2 So to say you're an expert witness implies</p> <p>3 that the judge has approved you, not the IAPSC.</p> <p>4 Forensic security consultant basically means that</p> <p>5 that's what you're primarily engaged in and perhaps</p> <p>6 you have been approved by a judge somewhere along</p> <p>7 the way.</p> <p>8 Q. I guess my question was a little bit -- I</p> <p>9 think it's a little different. Maybe you've</p> <p>10 answered it. But does IAPSC authorize its members</p> <p>11 to serve as, quote, forensic consultants and serve</p> <p>12 as expert witnesses in a court of law or other legal</p> <p>13 proceeding? I'm not asking if a judge designates</p> <p>14 them. I'm asking does IAPSC authorize its members</p> <p>15 to do that?</p> <p>16 A. No. I mean, authorize. I mean, I don't</p> <p>17 know if it authorizes anyone to do anything. The</p> <p>18 membership is primarily broken out into four</p> <p>19 categories. Guys that focus on the -- we talked</p> <p>20 about this with respect to the CSC designation. The</p> <p>21 membership is broken down primarily into three</p> <p>22 components. It really should be four because we</p> <p>23 should be including information security consultants</p> <p>24 as well. But number one is a security management</p> <p>25 consultant which is really the beginning of this</p>	<p>1 in other words, is not a mathematical formula, but</p> <p>2 instead it requires the security consultant to use</p> <p>3 their discretion, experience, and expertise in</p> <p>4 performing an assessment?</p> <p>5 A. Yes.</p> <p>6 Q. Do you agree that forensic security</p> <p>7 consultants applying the IAPSC Forensic Methodology</p> <p>8 may analyze information differently based on their</p> <p>9 different experiences in the security field?</p> <p>10 A. Yes.</p> <p>11 Q. Is it your opinion that this methodology</p> <p>12 in Appendix B is the correct methodology to use in</p> <p>13 A.G., G.W. and J.G. cases for a premises security</p> <p>14 expert?</p> <p>15 A. I'm sorry. What was the last phrase?</p> <p>16 Q. For a premises --</p> <p>17 MR. ALLUSHI: Objection.</p> <p>18 BY MR. BOUCHARD:</p> <p>19 Q. -- security expert?</p> <p>20 A. Yes.</p> <p>21 Q. And your testimony, if I understood it, is</p> <p>22 that you applied this methodology in coming to your</p> <p>23 opinions in your expert reports, is that correct?</p> <p>24 A. Yes, sir.</p> <p>25 Q. Did you conduct both a threat assessment</p>

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<p>1 and a vulnerability assessment?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Okay. And can you walk me through the</p> <p>4 threat assessment first and then walk me through the</p> <p>5 vulnerability assessment?</p> <p>6 A. Sure. So as I mentioned earlier, when we</p> <p>7 were talking about that five-step process, the</p> <p>8 threat assessment in this case really starts on</p> <p>9 page 17, I'm assuming of all three reports, but</p> <p>10 certainly the J.G. report, which is what we've been</p> <p>11 talking about. So the threat assessment component</p> <p>12 starting on page 17 talks about the general nature</p> <p>13 of sex trafficking, the prevalence data, right?</p> <p>14 What do we know nationwide?</p> <p>15 And then I go through and explain the</p> <p>16 methodology in greater detail. Obviously, the</p> <p>17 forensic methodology doesn't give you the</p> <p>18 granularity. So what I'm providing in the first few</p> <p>19 pages, 17, 18, 19, 20, 21, 22, 23, 24, 25, you know,</p> <p>20 basically, all the way to 27, so 17 to 27, is, you</p> <p>21 know, a deeper look at a methodology. It's not the</p> <p>22 methodology. It's a methodology for evaluating the</p> <p>23 crime. The actual crime history on the property.</p> <p>24 And then in 27 -- on page 27 I start the analysis of</p> <p>25 actual crimes as required by the forensic</p>	<p>1 by looking at the existing security measures. So 30</p> <p>2 to 35 provides with you the vulnerability</p> <p>3 assessment.</p> <p>4 Q. And thank you for that overview, sir.</p> <p>5 Appendix B, pages 4 and 5 talk about several areas</p> <p>6 that are numbered 1 through 5 that can be part of a</p> <p>7 vulnerability assessment/security survey. And on</p> <p>8 page 4 before number 1 in that list it says, "The</p> <p>9 following areas in review are not meant to be</p> <p>10 all-inclusive nor all exclusive. The decision to</p> <p>11 review the material is at the judgment/discretion of</p> <p>12 the expert."</p> <p>13 Do you see that?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Did you go through and follow all five of</p> <p>16 these items listed on pages 4 and 5, incident</p> <p>17 review, site inspections, security personnel,</p> <p>18 security management programs, security equipment?</p> <p>19 A. Yes, sir.</p> <p>20 Q. In other words, your findings on those</p> <p>21 issues are on pages 30 to 35?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Did you deviate from the IAPSC Forensic</p> <p>24 Methodology in any way in your analysis in these</p> <p>25 cases?</p>
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<p>1 methodology, you know, along with the prior ten</p> <p>2 pages.</p> <p>3 And then on page 28 because the forensic</p> <p>4 methodology also requires me to look at, you know,</p> <p>5 something more than just prior similars, it requires</p> <p>6 me to look at the inherent threats which in your</p> <p>7 world I think would encompass the totality of the</p> <p>8 circumstances. You know, the inherent threat</p> <p>9 assessment is on page 28.</p> <p>10 And then because we are in a matter</p> <p>11 involving litigation, obviously, we've got to look</p> <p>12 at kind of that -- you know, I'm not using a legal</p> <p>13 term, but notice, right? We have to look at that</p> <p>14 awareness crime. So that's why I start on page 28.</p> <p>15 And then 29 was just a bonus, because that</p> <p>16 code violation discussion.</p> <p>17 And then the vulnerability assessment</p> <p>18 really comes into its own on page 30 and then goes</p> <p>19 all the way down to page 35. So that is the</p> <p>20 evaluation -- like I told you, in order to</p> <p>21 understand the vulnerabilities, you have to</p> <p>22 understand what existing security measures are. You</p> <p>23 have to understand what you're trying to protect,</p> <p>24 what you're protecting against and where your</p> <p>25 weaknesses are. And you understand your weaknesses</p>	<p>1 A. No.</p> <p>2 Q. Yesterday, I'll represent to you I</p> <p>3 received from United Inn's counsel several</p> <p>4 documents. One of which was a copy of your CV. I</p> <p>5 received some documents in the latter half of the</p> <p>6 day and did not have time to compare your CV to the</p> <p>7 CV that's in your June 14th reports. Are there any</p> <p>8 changes that have been made to your CV since the</p> <p>9 June 14th reports?</p> <p>10 A. Yes, I'm sure there are. The thing that</p> <p>11 comes to mind is I taught a class earlier this month</p> <p>12 to ASIS International on evidence-based security</p> <p>13 practices. So you'll see a November 8th entry on my</p> <p>14 publications and presentations list.</p> <p>15 I also was asked to author The Guideline</p> <p>16 on Human Trafficking Victim Identification and</p> <p>17 Response for the International Association of</p> <p>18 Healthcare Security and Safety. I may have also</p> <p>19 added in the NCMEC training, the National Center for</p> <p>20 Missing & Exploited Children sex trafficking</p> <p>21 training that I took. There may be a couple other</p> <p>22 changes but those are the three that come to mind.</p> <p>23 MR. BOUCHARD: And just as an aside, I</p> <p>24 think I have probably 10 to 15 minutes left.</p> <p>25 Is everybody okay with my finishing out or do</p>

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<p>1 we need to take a break?</p> <p>2 MS. RICHENS: I'm fine with you</p> <p>3 proceeding.</p> <p>4 (Overtalking.)</p> <p>5 MR. ALLUSHI: -- a break.</p> <p>6 BY MR. BOUCHARD:</p> <p>7 Q. Mr. Vellani, in what areas have you been</p> <p>8 qualified as an expert witness previously?</p> <p>9 A. You mean by a judge?</p> <p>10 Q. That's correct, yes, sir.</p> <p>11 A. So I think all of my prior trial testimony</p> <p>12 would have been just on the general concept of crime</p> <p>13 analysis, crime prevention, and security. But,</p> <p>14 obviously, there's a whole bunch of stuff that falls</p> <p>15 underneath that.</p> <p>16 Q. Have you ever been qualified by a judge as</p> <p>17 an expert witness in sex trafficking?</p> <p>18 A. No. I'm not holding myself out as an</p> <p>19 expert on sex trafficking.</p> <p>20 Q. Understood. I'm just clarifying.</p> <p>21 Has your testimony ever been excluded by a</p> <p>22 court or a judge, to your knowledge, sir?</p> <p>23 A. No, sir.</p> <p>24 Q. Has your testimony ever been limited by a</p> <p>25 court or a judge, to your knowledge?</p>	<p>1 Q. Okay. Do you have any working</p> <p>2 understanding of how many times you've been</p> <p>3 designated as an expert for a plaintiff versus for a</p> <p>4 defendant?</p> <p>5 A. Designations would probably be -- at this</p> <p>6 point in my career probably 60 percent defense,</p> <p>7 40 percent plaintiff, if I had to guess. I hate to</p> <p>8 say this but there are cases where I've learned that</p> <p>9 I was designated by an attorney without my approval,</p> <p>10 without even knowing about the case. So I welcome</p> <p>11 reports and designations. So there are maybe more</p> <p>12 that have occurred that I'm just not aware of.</p> <p>13 And then, you know, if you want to go</p> <p>14 further than that, depositions, and trials, I</p> <p>15 mean...</p> <p>16 Q. Have you been qualified as an expert on</p> <p>17 behalf of a hotel defendant in a civil sex</p> <p>18 trafficking case before?</p> <p>19 A. Sex trafficking? No. I'm not even aware</p> <p>20 of any sex trafficking cases that have gone to trial</p> <p>21 yet.</p> <p>22 Q. Okay. Well, even before trial, when</p> <p>23 there's pretrial motions on experts, are you</p> <p>24 aware -- I don't know, have you been involved in any</p> <p>25 cases as an expert involving sex trafficking</p>
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<p>1 A. That I'm going to hedge and say I don't</p> <p>2 know. Because I have walked in a court in Georgia</p> <p>3 and been told by counsel that the judge is only</p> <p>4 letting in certain data. So I don't know if that</p> <p>5 was a limitation on me or a limitation on the data.</p> <p>6 I took it as a limitation on the data but I don't</p> <p>7 know to say one way or the other because I don't</p> <p>8 know. I don't see those orders or whatever,</p> <p>9 whatever results from that, you know.</p> <p>10 Q. Do you know what kind of case that was in</p> <p>11 Georgia?</p> <p>12 A. Yeah. I want to say it was an apartment</p> <p>13 robbery shooting. And I remember being prepared to</p> <p>14 walk in and talk about 30 prior violent crimes on</p> <p>15 the property and the judge -- I guess, the judge had</p> <p>16 limited it to, like, only 13 being admissible. I</p> <p>17 don't know if I have my numbers right but that's</p> <p>18 generally the premise.</p> <p>19 Q. Approximately how many times in total --</p> <p>20 and emphasis on approximately unless you know the</p> <p>21 exact answer -- have you been designated as an</p> <p>22 expert witness?</p> <p>23 A. Designated?</p> <p>24 Q. Yes, sir.</p> <p>25 A. I have no idea. It's been a lot.</p>	<p>1 lawsuits against hotels?</p> <p>2 A. Yes.</p> <p>3 Q. And have you been involved in those cases</p> <p>4 as an expert for the hotel defendant or the</p> <p>5 trafficking plaintiff?</p> <p>6 A. The only -- the only one that I'm aware of</p> <p>7 right now is actually on behalf of neither of those</p> <p>8 parties. It's on behalf of the security company.</p> <p>9 You know what, let me take that back. So I've been</p> <p>10 designated as a security expert on behalf of the</p> <p>11 security company defendant in two cases. I think I</p> <p>12 was just designated on a case involving a hotel for</p> <p>13 the hotel defendant. Again, these are so early on</p> <p>14 that it's hard for me to know where they're at in</p> <p>15 every case. This is certainly one that's the</p> <p>16 furthest along.</p> <p>17 Q. Have you ever been retained as an expert</p> <p>18 on behalf of a plaintiff in a civil sex trafficking</p> <p>19 case?</p> <p>20 A. No, I haven't.</p> <p>21 Q. Have you been asked to provide any</p> <p>22 opinions rebutting either Naeshia McDowell or</p> <p>23 Darrell Chaneyfield?</p> <p>24 A. I don't know that I was explicitly asked</p> <p>25 to provide opinions regarding Mr. Chaneyfield.</p>

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<p>1 Though I do have opinions. And the other guy, I</p> <p>2 think is who, the trafficking expert?</p> <p>3 Q. Naeshia McDowell?</p> <p>4 A. Is that the trafficking expert?</p> <p>5 Q. Yes.</p> <p>6 A. I was not asked to rebut any testimony</p> <p>7 regarding the trafficking experts.</p> <p>8 Q. And I take it based on our prior question</p> <p>9 and answer, you have not prepared a rebuttal expert</p> <p>10 report?</p> <p>11 A. For Chaneyfield? No.</p> <p>12 Q. Okay. And you, obviously, don't mention</p> <p>13 him in your June 14th report, is that correct?</p> <p>14 A. I don't think I knew about him at the</p> <p>15 time.</p> <p>16 Q. In the finals that I got from your counsel</p> <p>17 yesterday, there was an excerpt from his deposition.</p> <p>18 Are you familiar with that or do you need to review</p> <p>19 it? I can bring it up on the screen if you're not</p> <p>20 familiar with it.</p> <p>21 A. I'm intimately familiar with it.</p> <p>22 Q. Why is that in your file?</p> <p>23 A. Because Mr. Chaneyfield does not</p> <p>24 understand what allowed him to be a member. He said</p> <p>25 two things, quite frankly, that were very offensive</p>	<p>1 A. Well, I provided the methodology because</p> <p>2 that's the most updated methodology. I always</p> <p>3 provide the forensic methodology in response. I</p> <p>4 provide an updated CV and updated methodology, and I</p> <p>5 provide the references. That's kind of just routine</p> <p>6 course for me. The classifications of membership</p> <p>7 and the qualifications for membership were provided</p> <p>8 in context for the Chaneyfield excerpt. I mean,</p> <p>9 there's nothing in there that shows that IAPSC is</p> <p>10 deeming anyone an expert. They certainly didn't</p> <p>11 deem him an expert, and I certainly had nothing to</p> <p>12 do with this purported deeming of an expert.</p> <p>13 Q. Is Threat Analysis Group the company that</p> <p>14 you work for in your capacity as an expert?</p> <p>15 A. Threat Analysis Group, LLC is my company</p> <p>16 that does everything, right? So it's publications,</p> <p>17 research, security risk assessments, crime analysis,</p> <p>18 and the expert work.</p> <p>19 Q. Okay. And from what you've said, my</p> <p>20 understanding is that your expert work is a fraction</p> <p>21 of the revenue of Threat Analysis Group, is that</p> <p>22 correct?</p> <p>23 A. Yes, sir.</p> <p>24 Q. It's less than 50 percent, is that what</p> <p>25 you're saying?</p>
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<p>1 to me in my professional capacity. Number one, he</p> <p>2 stated that the IAPSC deemed him an expert. And</p> <p>3 that is simply factually not true. He outlined a</p> <p>4 process by which he obtained membership which is not</p> <p>5 accurate. And then on page 100 he claims that I was</p> <p>6 part of that process. I've not -- never met</p> <p>7 Mr. Chaneyfield. I don't know who he is. I've</p> <p>8 never seen Mr. Chaneyfield. I certainly was not</p> <p>9 involved in deeming him an expert. That is the most</p> <p>10 ludicrous proposition I've ever heard.</p> <p>11 Q. Are those the reasons why -- I mean, I</p> <p>12 still guess I don't understand why that excerpt from</p> <p>13 his transcript was in your file.</p> <p>14 MR. ALLUSHI: Objection.</p> <p>15 A. Yeah, I provided it for those reasons,</p> <p>16 because none of what he said on those three pages is</p> <p>17 true.</p> <p>18 BY MR. BOUCHARD:</p> <p>19 Q. Okay. There were also some documents that</p> <p>20 I received from your counsel yesterday, three IAPSC</p> <p>21 documents as being part of your file. One of which</p> <p>22 was IAPSC qualifications. One of which was IAPSC</p> <p>23 membership classifications. And one of which was</p> <p>24 the updated IAPSC Forensic Methodology. Why were</p> <p>25 those documents in your file?</p>	<p>1 A. Yes, far less.</p> <p>2 Q. Okay. Do you have a ballpark estimate of</p> <p>3 how much revenue Threat Analysis Group generates</p> <p>4 annually from your expert work?</p> <p>5 A. No, sir. That's not something I've ever</p> <p>6 looked at.</p> <p>7 Q. Is it more than a hundred thousand</p> <p>8 dollars?</p> <p>9 A. I don't know the answers to these</p> <p>10 questions regarding revenue. I can tell you where I</p> <p>11 spend my time. But I don't -- you know, that's not</p> <p>12 something I look at. I don't even have the</p> <p>13 capability to look at that. I should.</p> <p>14 Q. What percentage of your time do you spend</p> <p>15 on expert work?</p> <p>16 A. So pre-COVID it was 5 percent. During</p> <p>17 COVID when everything else shut down it rose to</p> <p>18 about 10 percent and unfortunately it's still</p> <p>19 sitting at 10 percent today, roughly. Obviously, I</p> <p>20 don't know account for every hour of every day. But</p> <p>21 it's about 10 percent on expert work. 20 percent on</p> <p>22 research. 70 percent on consulting work.</p> <p>23 Q. Something I didn't ask you earlier about</p> <p>24 your site inspection at United Inn and Suites. Were</p> <p>25 there any parameters put up on your site inspection</p>

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<p>1 in terms of how much time to spend? What you could</p> <p>2 look at, who you could talk to, or were you free to</p> <p>3 conduct any and all investigations that you wanted</p> <p>4 to?</p> <p>5 A. So I would probably fire a client that put</p> <p>6 in parameters on me with that. No, nobody put any</p> <p>7 parameters on me.</p> <p>8 MR. BOUCHARD: Okay. So I'm going to go</p> <p>9 off the record here for a few minutes to look</p> <p>10 at my notes. I think I've completed my</p> <p>11 examination of you. I wanted to just make a</p> <p>12 quick note for the record that we, obviously,</p> <p>13 don't have a rebuttal expert report from</p> <p>14 Mr. Vellani. The deadline for rebuttal expert</p> <p>15 report disclosures has come and gone. I</p> <p>16 understand it sounds like he has opinions about</p> <p>17 Mr. Chaneyfield's testimony or report, or I'm</p> <p>18 not sure. I would oppose and will oppose</p> <p>19 rebuttal expert testimony from Mr. Vellani</p> <p>20 because the deadline's passed and there hasn't</p> <p>21 been a rebuttal expert report provided. And so</p> <p>22 I'm reserving my right to come back and ask him</p> <p>23 questions about his rebuttal opinions. But I'm</p> <p>24 not even going to attempt to do that today</p> <p>25 because I don't have the benefit of a report</p>	<p>1 his second deposition in order to fully flesh this</p> <p>2 out. But to the extent that I'm just looking at his</p> <p>3 report, you know, I mean, I would like the benefit</p> <p>4 of the second -- of the rest of his deposition. But</p> <p>5 looking at his report, you know, he talked about --</p> <p>6 I disagree with his really first opinion which is</p> <p>7 that inadequate anti-trafficking materials. I think</p> <p>8 given that what we talked about with respect to</p> <p>9 training, what the hotel was doing, they had</p> <p>10 adequate and reasonable measures in place already.</p> <p>11 He also gives a second opinion which is inadequate</p> <p>12 security measures and coverage. I disagree with</p> <p>13 that for the reasons that I outline in my report and</p> <p>14 in this deposition. His -- I guess these are</p> <p>15 specifics about his second opinion. Third, well --</p> <p>16 bear with me because I'm having a hard time</p> <p>17 understanding the layout of his report. He's really</p> <p>18 just giving reasons.</p> <p>19 Okay. So let me back up. I see the way</p> <p>20 that he's got this laid out now. So opinion number</p> <p>21 one, he's got widely available and free</p> <p>22 anti-trafficking materials and trainings, educate</p> <p>23 hotel owners and staff about the observable signs of</p> <p>24 sex trafficking.</p> <p>25 So I think the problem is what we talked</p>
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<p>1 from him on that. So I'm just saying that for</p> <p>2 the record.</p> <p>3 MR. ALLUSHI: I certainly, for the record,</p> <p>4 disagree with that to the extent the</p> <p>5 information that he would rebut is new</p> <p>6 information and information that was derived</p> <p>7 from Mr. Chaneyfield's deposition, just for the</p> <p>8 record.</p> <p>9 You need five minutes to go off the</p> <p>10 record?</p> <p>11 MR. BOUCHARD: Yes. Let's go off the</p> <p>12 record for about five minutes. Thank you.</p> <p>13 THE VIDEOGRAPHER: Okay. Time on the</p> <p>14 monitor is 3:48 p.m. and we're off the record.</p> <p>15 (Recess 3:48 p.m. until 3:57 p.m.)</p> <p>16 THE VIDEOGRAPHER: The time on the monitor</p> <p>17 is 3:57 p.m. and we are back on the record.</p> <p>18 BY MR. BOUCHARD:</p> <p>19 Q. Mr. Vellani, just briefly, notwithstanding</p> <p>20 what I said a moment ago before we went off the</p> <p>21 record, again, I haven't received a rebuttal report</p> <p>22 and so forth, but you mentioned that you have</p> <p>23 opinions about Mr. Chaneyfield's testimony. I would</p> <p>24 like to hear what those opinions are.</p> <p>25 A. Well, I mean, I think in fairness, I need</p>	<p>1 about already. Which is that that's not</p> <p>2 evidence-based stuff. You know, he didn't cite to</p> <p>3 any evidence basis for what he's saying.</p> <p>4 Opinion number two, fell far short -- fell</p> <p>5 far below the industry standard by failing to</p> <p>6 provide anti-trafficking training materials. So I</p> <p>7 think they were actually on par with where the</p> <p>8 industry was at, specifically during the period 2017</p> <p>9 to 2019.</p> <p>10 Then he goes on to say failed to follow</p> <p>11 hotel safety and security industry standards during</p> <p>12 the relevant period pertaining to guest security and</p> <p>13 safety. I think I've adequately outlined why I</p> <p>14 disagree with that, but I disagree with that.</p> <p>15 Number four, he gives the opinion adequate</p> <p>16 training and security measures in effect more likely</p> <p>17 than not that the subject incidents described in the</p> <p>18 complaints would have prevented or avoided. I mean,</p> <p>19 I think even if you were to apply what he says, that</p> <p>20 it would be really speculative to say that they</p> <p>21 would have been prevented or avoided.</p> <p>22 And then -- that's it. He's only got</p> <p>23 those four opinions. So I disagree with three of</p> <p>24 them and one of them I think is just speculative</p> <p>25 that even I couldn't say. I couldn't even say the</p>



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<p align="right">Page 230</p> <p>1 opposite.</p> <p>2 Q. So when you said, you know, I do have an</p> <p>3 opinion -- I haven't been asked to provide any</p> <p>4 opinions rebutting him, but I do have opinions. I</p> <p>5 think you said that just before we took the break.</p> <p>6 I'm just trying to make sure I understand what those</p> <p>7 opinions are. Did you just give me them, or are</p> <p>8 there any others?</p> <p>9 A. Well, that's the big takeaways, try to do</p> <p>10 this in short order just looking at his four</p> <p>11 opinions. But, you know, like with me, you would</p> <p>12 have elicited additional opinions, very specific</p> <p>13 opinions that I've been happy to give to you. I</p> <p>14 would like the benefit, and I understand that</p> <p>15 there's, you know, deadlines that can't be thwarted,</p> <p>16 you know, I would like the benefit of hearing the</p> <p>17 full scope of his specific opinions by way of his</p> <p>18 deposition. And, obviously, we have not seen his</p> <p>19 second deposition yet or the continuation of his</p> <p>20 deposition. But based on his report, that's what I</p> <p>21 can give you.</p> <p>22 Q. Okay. Have you read his deposition</p> <p>23 transcript from the first part of his deposition?</p> <p>24 A. Yeah. That's how I ended up giving you</p> <p>25 those excerpts. Yes, sir, I have.</p>	<p align="right">Page 232</p> <p>1 MR. BOUCHARD: Okay. That concludes my</p> <p>2 questioning for you today, Mr. Vellani. I very</p> <p>3 much appreciate your time. Obviously, Adi or</p> <p>4 Dana may have questions for you.</p> <p>5 THE WITNESS: Thank you, sir.</p> <p>6 MR. ALLUSHI: No questions.</p> <p>7 CROSS-EXAMINATION</p> <p>8 BY MS. RICHENS:</p> <p>9 Q. I just have one question. Mr. Vellani,</p> <p>10 when you were being questioned earlier today about</p> <p>11 Exhibit 4 which is the bolo pertaining to [J.G.],</p> <p>12 you remember that line of questioning?</p> <p>13 A. Yes, sir -- yes, ma'am. Sorry.</p> <p>14 Q. And you indicated that you were -- we</p> <p>15 talked about posting the notice in the office and</p> <p>16 you said you would not recommend that they go door</p> <p>17 to door looking for [J.G.].</p> <p>18 Do you remember that testimony?</p> <p>19 A. Yes.</p> <p>20 Q. Why do you say that? In other words, why</p> <p>21 would you not recommend that someone go door to door</p> <p>22 looking for a missing person who there's reason to</p> <p>23 believe is on the property?</p> <p>24 A. Well, A, I'm not connecting the dots that</p> <p>25 a missing persons is what led them to believe she</p>
<p align="right">Page 231</p> <p>1 Q. Okay. And any other opinions based on</p> <p>2 that part that you've reviewed that you're not</p> <p>3 sharing with me right now? I'm trying to understand</p> <p>4 what opinions you have as you sit here right now.</p> <p>5 A. I don't know that -- I don't know that I</p> <p>6 can lay them all out for you without spending some</p> <p>7 time with that deposition. Again, I didn't intend</p> <p>8 to do that until I had the benefit of the</p> <p>9 continuation of the deposition. So, you know,</p> <p>10 beyond what I've given you thus far with respect to</p> <p>11 his written opinions, I don't think I can dig deeper</p> <p>12 at this point without having some more time to be</p> <p>13 able to spend with the first deposition and in the</p> <p>14 continuation just in regard to anything specific</p> <p>15 that he says.</p> <p>16 Q. And these questions that I'm asking you</p> <p>17 are not a waiver or intended to be a waiver of my</p> <p>18 prior point on the rebuttal deadline having passed.</p> <p>19 But while I have you here and I have</p> <p>20 United Inn's counsel here, I wanted to ask you,</p> <p>21 since you said you had opinions, I wanted to ask you</p> <p>22 what those were. And I understand you have shared</p> <p>23 to the extent you can today what your opinions are.</p> <p>24 Is that a fair summary?</p> <p>25 A. Yes, sir.</p>	<p align="right">Page 233</p> <p>1 was on the property when they got that flyer.</p> <p>2 That's number one. Number two, I don't think that</p> <p>3 would be the normal process. That would not be</p> <p>4 standard practice in a hotel that I have ever heard</p> <p>5 of that would sit there and go door to door</p> <p>6 inspecting every room. I mean, if you had reason to</p> <p>7 believe there was a person in a specific room, sure,</p> <p>8 you might go and fake an inspection that needed to</p> <p>9 be done or sent housekeepers over there. But to</p> <p>10 literally go there and inspect every hotel room</p> <p>11 seems unreasonable.</p> <p>12 Q. Any other reason or it's just simply</p> <p>13 unreasonable?</p> <p>14 A. Yes. It's just not the normal practice.</p> <p>15 MS. RICHENS: Thank you.</p> <p>16 MR. BOUCHARD: I'm sorry. There's one</p> <p>17 thing I meant to introduce. I apologize.</p> <p>18 REDIRECT EXAMINATION</p> <p>19 BY MR. BOUCHARD:</p> <p>20 Q. Mr. Vellani, we received yesterday your</p> <p>21 invoices in the A.G., G.W. and J.G. matters. And I</p> <p>22 can show them to you if you would like me to. But</p> <p>23 I'll represent to you that Adi and Dana provided</p> <p>24 them to me. I would like to introduce those</p> <p>25 respectively as Plaintiffs' Exhibits 5, 6, and 7,</p>

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<p align="right">Page 234</p> <p>1 A.G. would be 6 -- I'm sorry --A.G.'s invoices would</p> <p>2 be 5, G.W.'s would be 6 and J.G.'s would be 7.</p> <p>3 THE STENOGRAPHER: I think I already have</p> <p>4 a 5, sir.</p> <p>5 MR. BOUCHARD: Okay. Let's make A.G. 6,</p> <p>6 G.W. 7 and J.G. 8.</p> <p>7 MR. ALLUSHI: Are you going to ask</p> <p>8 questions about them?</p> <p>9 MR. BOUCHARD: Am I going to ask him</p> <p>10 questions about them?</p> <p>11 MR. ALLUSHI: Right.</p> <p>12 MR. BOUCHARD: I was going to ask him if</p> <p>13 he would like to see them or if he's familiar</p> <p>14 with the invoices that you guys sent me</p> <p>15 yesterday.</p> <p>16 MR. ALLUSHI: Okay. I don't have an</p> <p>17 objection, obviously, at trial you would have</p> <p>18 to -- you know, I'm not stipulating these are</p> <p>19 admissible at trial. I'm saying if you want to</p> <p>20 ask him questions or you want to submit them at</p> <p>21 this deposition, I have no objection to that.</p> <p>22 MR. BOUCHARD: Yeah. I don't have any</p> <p>23 questions about them at this point. I'm not</p> <p>24 expecting you to stipulate to them.</p> <p>25 BY MR. BOUCHARD:</p>	<p align="right">Page 236</p> <p>1 CERTIFICATE OF OATH</p> <p>2</p> <p>3 I, the undersigned authority, certify</p> <p>4 that KARIM VELLANI remotely appeared before me</p> <p>5 and was duly sworn on the 28th day of November,</p> <p>6 2023.</p> <p>7 </p> <p>8</p> <p>9</p> <p>10</p> <p>11 EDWARD F. KIDD, RPR</p> <p>12 Notary Public, State of Florida</p> <p>13 My Commission No. HH126175</p> <p>14 Expires: 6/25/25</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p align="right">Page 235</p> <p>1 Q. But, Mr. Vellani, you do know the invoices</p> <p>2 that your counsel provided to me yesterday for those</p> <p>3 three cases?</p> <p>4 A. Yes, sir.</p> <p>5 MR. BOUCHARD: Okay. I'm admitting those</p> <p>6 at least for purposes of this deposition as</p> <p>7 Plaintiffs' Exhibit 6, 7, and 8.</p> <p>8 (Thereupon, marked Plaintiff Exhibits 6</p> <p>9 through 8.)</p> <p>10 MR. BOUCHARD: Okay. All right. Thank</p> <p>11 you, Mr. Vellani, for your time.</p> <p>12 MR. ALLUSHI: We'll read and sign and I'll</p> <p>13 take a PDF package, thank you.</p> <p>14 THE STENOGRAPHER: Mr. Bouchard, are you</p> <p>15 ordering?</p> <p>16 MR. BOUCHARD: Yes, a PDF package, please.</p> <p>17 MS. RICHENS: Same here.</p> <p>18 THE VIDEOGRAPHER: The time is 4:07 p.m.</p> <p>19 and we're off the record.</p> <p>20 THE STENOGRAPHER: Would you like a copy,</p> <p>21 Mr. Mobley?</p> <p>22 MR. MOBLEY: No.</p> <p>23 MR. ALLUSHI: We're the same firm.</p> <p>24 THE STENOGRAPHER: Oh, right. Sorry.</p> <p>25 (The proceedings concluded at 4:07 p.m.)</p>	<p align="right">Page 237</p> <p>1 CERTIFICATE OF REPORTER</p> <p>2</p> <p>3</p> <p>4 I, EDWARD F. KIDD, Registered</p> <p>5 Professional Reporter, do hereby certify that I</p> <p>6 was authorized to and did stenographically report</p> <p>7 the foregoing remote Zoom video-recorded</p> <p>8 deposition of KARIM VELLANI; that a review of the</p> <p>9 transcript was requested; and that the transcript</p> <p>10 is a true record of my stenographic notes.</p> <p>11 I FURTHER CERTIFY that I am not a</p> <p>12 relative, employee, attorney, or counsel of any</p> <p>13 of the parties, nor am I a relative or employee</p> <p>14 of any of the parties' attorneys or counsel</p> <p>15 connected with the action, nor am I financially</p> <p>16 interested in the action.</p> <p>17 Dated this 30th day of November, 2023.</p> <p>18</p> <p>19 </p> <p>20</p> <p>21 EDWARD F. KIDD, RPR</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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1 ERRATA SHEET
2 DO NOT WRITE ON TRANSCRIPT
ENTER CHANGES ON THIS PAGE
3
In Re: G.W. V NORTHBROOK
4 Case No.: 1:20-CV-05232-JPB
KARIM VELLANI
5 November 28th, 2023
6 PAGE LINE CHANGE REASON
7 _____
8 _____
9 _____
10 _____
11 _____
12 _____
13 _____
14 _____
15 _____
16 Under penalties of perjury, I declare that I have
read the foregoing transcript of the above
17 proceeding and I hereby swear that my testimony
therein was true at the time it was given and is now
18 true and correct, including any corrections and/or
amendments listed above.
19 Signature of Witness _____
20 Dated this _____ day of _____, _____.
21
22
23
24
25

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